

EXHIBIT 6

1
2 UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

3 ----- X

4 NATIONAL ASSOCIATION FOR
THE ADVANCEMENT OF
COLORED PEOPLE,
5 SPRING VALLEY BRANCH, et al.,
6 Plaintiffs,

7 vs. No.

7:17-cv-08943

8
9 EAST RAMAPO CENTRAL
SCHOOL DISTRICT, et al.,
10 Defendants.

----- X

11
12 February 7, 2018

13 12:05 p.m.

14
15
16 Deposition of CHEVON DOS REIS,
17 held at the offices of Morgan, Lewis &
18 Bockius LLP, 101 Park Avenue, New York,
19 New York, pursuant to Notice, before
20 Theresa Tramondo, AOS, CLR, a Notary
21 Public of the State of New York.

22
23 Reported by:

24 THERESA TRAMONDO, AOS, CLR

25 JOB NO. PA2808168A

<p style="text-align: right;">Page 2</p> <p>1</p> <p>2 APPEARANCE OF COUNSEL:</p> <p>3 FOR PLAINTIFFS:</p> <p>4 LATHAM & WATKINS LLP</p> <p>5 885 Third Avenue</p> <p>6 New York, New York 10022-4834</p> <p>7 BY: THOMAS C. PEARCE, ESQ.</p> <p>8 COREY A. CALABRESE, ESQ.</p> <p>9 ANDREJ NOVAKOVSKI, LAW CLERK</p> <p>10 Thomas.pearce@lw.com</p> <p>11 Corey.calabrese@lw.com</p> <p>12 Andrej.novakovski@lw.com</p> <p>13 212-906-1200</p> <p>14 FOR DEFENDANT EAST RAMAPO CENTRAL SCHOOL</p> <p>15 DISTRICT:</p> <p>16 MORGAN, LEWIS & BOCKIUS LLP</p> <p>17 1111 Pennsylvania Avenue, NW</p> <p>18 Washington, D.C. 20004-2541</p> <p>19 BY: RANDALL M. LEVINE, ESQ.</p> <p>20 DAVID J. BUTLER, ESQ.</p> <p>21 ADAM ADLER, ESQ.</p> <p>22 Randall.levine@morganlewis.com</p> <p>23 David.butler@morganlewis.com</p> <p>24 Adam.adler@morganlewis.com</p> <p>25 202-373-6541</p>	<p style="text-align: right;">Page 4</p> <p>1</p> <p>2</p> <p>3 STIPULATIONS</p> <p>4</p> <p>5</p> <p>6 IT IS HEREBY STIPULATED AND AGREED,</p> <p>7 by and among counsel for the respective</p> <p>8 parties hereto, that the filing,</p> <p>9 sealing and certification of the within</p> <p>10 deposition shall be and the same are</p> <p>11 hereby waived;</p> <p>12 IT IS FURTHER STIPULATED AND AGREED</p> <p>13 that all objections, except as to form</p> <p>14 of the question, shall be reserved to</p> <p>15 the time of the trial;</p> <p>16 IT IS FURTHER STIPULATED AND AGREED</p> <p>17 that the within deposition may be signed</p> <p>18 before any Notary Public with the same</p> <p>19 force and effect as if signed and sworn to</p> <p>20 before the Court.</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p style="text-align: right;">Page 3</p> <p>1</p> <p>2 APPEARANCE OF COUNSEL (CONT'D):</p> <p>3</p> <p>4 FOR DEFENDANT COMMISSIONER MARYELLEN ELIA:</p> <p>5 STATE OF NEW YORK OFFICE OF THE</p> <p>6 ATTORNEY GENERAL ERIC T. SCHNEIDERMAN</p> <p>7 120 Broadway</p> <p>8 New York, New York 10271-0332</p> <p>9 BY: ELYCE MATTHEWS, ESQ.</p> <p>10 Elyce.matthews@ag.ny.gov</p> <p>11 212-416-8965</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 5</p> <p>1</p> <p>2 BY THE COURT REPORTER:</p> <p>3 Q. Please state your full name for</p> <p>4 the record.</p> <p>5 A. Chevon Dos Reis, C-H-E-V-O-N,</p> <p>6 D-O-S, R-E-I-S.</p> <p>7 Q. What is your address?</p> <p>8 A. Home, 64 South Main Street,</p> <p>9 Apartment 2D, Spring Valley, New York, New</p> <p>10 York 10977.</p> <p>11 C H E V O N D O S R E I S, called as a</p> <p>12 witness, having been duly sworn by a</p> <p>13 Notary Public, was examined and testified</p> <p>14 as follows:</p> <p>15 EXAMINATION BY</p> <p>16 MR. LEVINE:</p> <p>17 Q. We are on the record. Good</p> <p>18 afternoon, Ms. Dos Reis. My name is Randall</p> <p>19 Levine. I'm an attorney for the East Ramapo</p> <p>20 Central School District.</p> <p>21 Could you state your full name</p> <p>22 for the record, please?</p> <p>23 A. Chevon Dos Reis.</p> <p>24 Q. What is your address?</p> <p>25 A. 64 South Main Street, Apartment</p>

<p style="text-align: right;">Page 6</p> <p>1 Dos Reis</p> <p>2 2D, Spring Valley, New York 10977.</p> <p>3 Q. Thank you.</p> <p>4 Do you understand that you're</p> <p>5 here today to give testimony for a case</p> <p>6 called NAACP versus East Ramapo Central</p> <p>7 School District?</p> <p>8 A. Yes.</p> <p>9 Q. Are you represented by counsel</p> <p>10 today?</p> <p>11 A. Yes.</p> <p>12 Q. And is that your lawyer sitting</p> <p>13 next to you?</p> <p>14 A. Yes.</p> <p>15 Q. Have you ever been deposed</p> <p>16 before?</p> <p>17 A. Yes.</p> <p>18 Q. You have.</p> <p>19 When was the last time you were</p> <p>20 deposed?</p> <p>21 A. Early last year. April, I</p> <p>22 believe, of 2017.</p> <p>23 Q. What was that case about?</p> <p>24 A. An incident involving my mom</p> <p>25 taking a fall.</p>	<p style="text-align: right;">Page 8</p> <p>1 Dos Reis</p> <p>2 read on the transcript. Understand?</p> <p>3 A. Yes.</p> <p>4 Q. There may be times today when</p> <p>5 your counsel will object to one of my</p> <p>6 questions. If that happens, that's not an</p> <p>7 instruction to you not to answer the</p> <p>8 question. Do you understand?</p> <p>9 A. Yes.</p> <p>10 Q. So if you understand my</p> <p>11 question, even if there is an objection, you</p> <p>12 should still answer. All right?</p> <p>13 A. Yes.</p> <p>14 Q. When you answer questions,</p> <p>15 you're already doing a good job, but I need</p> <p>16 you to answer verbally with a yes or a no or</p> <p>17 some other statement, but no head shakes or</p> <p>18 shoulder shrugs or other things that don't</p> <p>19 show up on paper. Understand?</p> <p>20 A. Yes.</p> <p>21 Q. If I ask you a question and you</p> <p>22 don't understand the question, just let me</p> <p>23 know, I will try to rephrase it as best I</p> <p>24 can. If you don't ask me to rephrase it,</p> <p>25 then I will assume that you understood me.</p>
<p style="text-align: right;">Page 7</p> <p>1 Dos Reis</p> <p>2 Q. Had you ever been deposed before</p> <p>3 that?</p> <p>4 A. No.</p> <p>5 Q. All right. Since you've been</p> <p>6 through this before, we will just quickly go</p> <p>7 over the ground rules.</p> <p>8 Your answers will be given under</p> <p>9 oath today subject to the penalty of perjury</p> <p>10 just as you were testifying in a courtroom.</p> <p>11 Do you understand?</p> <p>12 A. Yes.</p> <p>13 Q. I'm going to ask you a series of</p> <p>14 questions, and your job today is to answer</p> <p>15 as truthfully and fully as you can manage to</p> <p>16 the very best of your recollection. Do you</p> <p>17 understand?</p> <p>18 A. Yes.</p> <p>19 Q. For the sake of the court</p> <p>20 reporter, it's much easier if we don't talk</p> <p>21 over each other. So I will do my very best</p> <p>22 to ask you one complete question and stop</p> <p>23 talking, which is not easy for me, and if</p> <p>24 you wait for me to stop talking and then</p> <p>25 answer, everything will be much easier to</p>	<p style="text-align: right;">Page 9</p> <p>1 Dos Reis</p> <p>2 Okay?</p> <p>3 A. Yes.</p> <p>4 Q. If at any point you need to take</p> <p>5 a break, just ask.</p> <p>6 A. Okay.</p> <p>7 Q. All I will ask of you in return</p> <p>8 is that if I have a question pending, answer</p> <p>9 the question, and then we will take the</p> <p>10 break. Okay?</p> <p>11 A. Yes.</p> <p>12 Q. Having gone through the</p> <p>13 preliminaries, let's get through a few more</p> <p>14 intro pieces. Did you do anything today to</p> <p>15 prepare for this deposition?</p> <p>16 A. No.</p> <p>17 Q. Did you review any documents</p> <p>18 before you came here today?</p> <p>19 A. No.</p> <p>20 Q. Did you -- without telling me</p> <p>21 anything about what you may have discussed</p> <p>22 with your attorneys, did you meet with your</p> <p>23 attorneys before coming today to prepare for</p> <p>24 your deposition?</p> <p>25 MR. PEARCE: If I can just</p>

<p style="text-align: right;">Page 10</p> <p>1 Dos Reis</p> <p>2 interject, Chevon. Randy already</p> <p>3 pointed out, anything we discuss is</p> <p>4 privileged, so I will instruct you not</p> <p>5 to provide that information, but to</p> <p>6 the extent we met, you can answer that</p> <p>7 question.</p> <p>8 MR. LEVINE: No speaking</p> <p>9 objections at the deposition.</p> <p>10 Q. So the question was, without</p> <p>11 telling me about anything you may have</p> <p>12 discussed with your attorneys, did you meet</p> <p>13 with your attorneys to prepare for this</p> <p>14 deposition?</p> <p>15 A. Yes.</p> <p>16 Q. When did you meet with your</p> <p>17 attorneys to prepare for the deposition?</p> <p>18 A. Last week Wednesday.</p> <p>19 Q. Any other times?</p> <p>20 A. Thursday and Friday.</p> <p>21 Q. Again, without telling me</p> <p>22 anything about what was discussed, was</p> <p>23 anybody else there besides your attorneys at</p> <p>24 that meeting on Wednesday?</p> <p>25 A. No.</p>	<p style="text-align: right;">Page 12</p> <p>1 Dos Reis</p> <p>2 Q. Is it correct that this is the</p> <p>3 declaration of Chevon Dos Reis that was</p> <p>4 filed in connection with this case?</p> <p>5 A. Yes.</p> <p>6 Q. Turn to the very, very last page</p> <p>7 of the document, page 8. Is that your</p> <p>8 signature close to the middle of the page?</p> <p>9 A. Yes.</p> <p>10 Q. Do you remember signing this</p> <p>11 document on November 6, 2017?</p> <p>12 A. Yes.</p> <p>13 Q. Did you write this document?</p> <p>14 A. Yes.</p> <p>15 Q. You wrote it yourself?</p> <p>16 A. Yes.</p> <p>17 Q. Did anybody help you with it?</p> <p>18 A. No.</p> <p>19 Q. No. All right.</p> <p>20 Did you talk with anybody else</p> <p>21 when you were writing this document?</p> <p>22 A. Aside from my attorney, no.</p> <p>23 Q. No. Okay.</p> <p>24 Did you speak with any of the</p> <p>25 other plaintiffs in this case --</p>
<p style="text-align: right;">Page 11</p> <p>1 Dos Reis</p> <p>2 Q. How about the next meeting,</p> <p>3 anybody else there?</p> <p>4 A. No.</p> <p>5 Q. How about the next meeting,</p> <p>6 anybody else there?</p> <p>7 A. No.</p> <p>8 MR. LEVINE: I'm going to mark</p> <p>9 for identification as Dos Reis Exhibit</p> <p>10 1 this document.</p> <p>11 (Dos Reis Exhibit 1, document,</p> <p>12 declaration of Chevon Dos Reis, marked</p> <p>13 for identification, as of this date.)</p> <p>14 Q. So you have just been shown a</p> <p>15 document that we have marked as Exhibit Dos</p> <p>16 Reis 1. If I'm not saying your last name</p> <p>17 correctly, please let me know. Take a</p> <p>18 moment to just look over the document and</p> <p>19 familiarize yourself with it, and as soon as</p> <p>20 you're ready, just look up and let me know.</p> <p>21 Are you about ready, do you</p> <p>22 think?</p> <p>23 A. Yes, that's fine.</p> <p>24 Q. Do you recognize this document?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 13</p> <p>1 Dos Reis</p> <p>2 A. No.</p> <p>3 Q. -- when you were writing this</p> <p>4 document?</p> <p>5 A. No.</p> <p>6 Q. No. All right.</p> <p>7 Having familiarized yourself</p> <p>8 again with the statements, as you sit here</p> <p>9 today, do you agree with all of the</p> <p>10 statements that are included in this</p> <p>11 declaration?</p> <p>12 A. Yes.</p> <p>13 Q. So there is nothing in this</p> <p>14 declaration that you would want to change or</p> <p>15 modify at all as you sit here today, right?</p> <p>16 A. No.</p> <p>17 Q. I would like to ask you a few</p> <p>18 questions about it, specifically why don't</p> <p>19 we talk first about your run for the school</p> <p>20 board.</p> <p>21 So you ran for an open seat on</p> <p>22 the East Ramapo Central School District</p> <p>23 Board of Education in 2017, right?</p> <p>24 A. Yes.</p> <p>25 Q. What was your campaign platform</p>

<p style="text-align: right;">Page 14</p> <p>1 Dos Reis</p> <p>2 for your election?</p> <p>3 A. Our platform was to bring</p> <p>4 positive change to the East Ramapo Central</p> <p>5 School District. We wanted to bring</p> <p>6 better -- to bring services that we had</p> <p>7 lost. We wanted to ensure that any and all</p> <p>8 funds were appropriately disbursed</p> <p>9 throughout the East Ramapo School District</p> <p>10 so that things such as infrastructure would</p> <p>11 be appropriately worked out. We wanted to</p> <p>12 bring transparency to the board, that was</p> <p>13 big for us, transparency, trust between the</p> <p>14 board and the East Ramapo School District</p> <p>15 parents, students, teachers, administrators,</p> <p>16 and we wanted to try and mend the</p> <p>17 relationship or make the relationship</p> <p>18 stronger between both the public and the</p> <p>19 private sector.</p> <p>20 Q. What do you mean when you say</p> <p>21 "the public and the private sector"?</p> <p>22 A. Public school parents and</p> <p>23 private school parents.</p> <p>24 Q. What do you mean by "public</p> <p>25 school parents"?</p>	<p style="text-align: right;">Page 16</p> <p>1 Dos Reis</p> <p>2 whose first language isn't English.</p> <p>3 Q. ESL teachers?</p> <p>4 A. Right, yes.</p> <p>5 Q. How many ESL teachers, do you</p> <p>6 think?</p> <p>7 MR. PEARCE: Objection.</p> <p>8 A. Not -- I don't have a specific</p> <p>9 number. Just whatever the school district</p> <p>10 needs.</p> <p>11 Q. Anything else?</p> <p>12 A. As far as services, those were</p> <p>13 our top priority.</p> <p>14 Q. Turning to your declaration,</p> <p>15 take a look at it, and take a look at</p> <p>16 paragraph 18. In the second sentence of</p> <p>17 paragraph 18, just so everybody can follow</p> <p>18 along, I'll read it, you said, "I ran</p> <p>19 because I believed that as a board member I</p> <p>20 could ensure access to a proper education</p> <p>21 for my children and all of the children</p> <p>22 attending public schools in the district."</p> <p>23 Is there anything else besides</p> <p>24 what you just told me that you think you</p> <p>25 would have wanted to do as a board member to</p>
<p style="text-align: right;">Page 15</p> <p>1 Dos Reis</p> <p>2 A. Children who attend public</p> <p>3 schools, and the children who attend private</p> <p>4 schools.</p> <p>5 Q. So you mean the parents of</p> <p>6 children who attend public schools and the</p> <p>7 parents of children who attend private</p> <p>8 schools, right?</p> <p>9 A. Yes. We wanted to work on</p> <p>10 bringing both together so that when we're</p> <p>11 discussing budget funds that need to be</p> <p>12 allocated that both parents and</p> <p>13 administrators from the -- who attend</p> <p>14 private schools and public schools would be</p> <p>15 able to come to the table together to</p> <p>16 discuss what's needed in both.</p> <p>17 Q. What services did you want to</p> <p>18 see returned to the school district</p> <p>19 specifically?</p> <p>20 A. Specifically social workers.</p> <p>21 Q. Anything else?</p> <p>22 A. Guidance counselors.</p> <p>23 Q. Anything else?</p> <p>24 A. Not special ed, but teachers who</p> <p>25 could help the children whose language --</p>	<p style="text-align: right;">Page 17</p> <p>1 Dos Reis</p> <p>2 ensure access to a proper education for all</p> <p>3 of the children attending public schools in</p> <p>4 the district?</p> <p>5 A. Yes. As I stated before,</p> <p>6 bringing transparency as a board member,</p> <p>7 being able to communicate to parents and</p> <p>8 students exactly what is happening, what</p> <p>9 decisions are being made once they're made</p> <p>10 and why and asking the parents and students</p> <p>11 and administrators what they feel they need</p> <p>12 in the schools to better -- so that they</p> <p>13 have better access to academic success and</p> <p>14 doing things like that.</p> <p>15 Q. Anything else?</p> <p>16 A. There are so many things. The</p> <p>17 top priorities, like I said, were services,</p> <p>18 transparency, communication with students,</p> <p>19 parents, teachers, administrators and the</p> <p>20 board. There are so many things.</p> <p>21 Q. Were you interested in</p> <p>22 controlling costs for public education?</p> <p>23 A. Controlling costs?</p> <p>24 Q. Um-hum.</p> <p>25 A. Not necessarily controlling</p>

<p style="text-align: right;">Page 18</p> <p>1 Dos Reis</p> <p>2 costs, but making sure that funds that the</p> <p>3 school district receives are appropriately</p> <p>4 and fairly distributed.</p> <p>5 Q. Does that mean that you think</p> <p>6 that funds are not being fairly and</p> <p>7 appropriately distributed now?</p> <p>8 A. Based upon layoffs of teachers</p> <p>9 and the infrastructure of our buildings, no,</p> <p>10 I do not.</p> <p>11 Q. What's inappropriate about the</p> <p>12 way funds are being distributed now?</p> <p>13 A. I don't know exactly where the</p> <p>14 funds are going. For a long time we didn't</p> <p>15 know where the funds were being distributed.</p> <p>16 Q. When you say "funds," what do</p> <p>17 you mean?</p> <p>18 A. As to -- you know, the state</p> <p>19 gives East Ramapo a certain amount of money.</p> <p>20 We get money from different places. And we</p> <p>21 have buildings falling apart. We had lead</p> <p>22 in the water for years, and they just found</p> <p>23 out last year that the water was not</p> <p>24 drinkable, yet the children had been</p> <p>25 drinking it for years.</p>	<p style="text-align: right;">Page 20</p> <p>1 Dos Reis</p> <p>2 is spending too much money on busing?</p> <p>3 A. I don't know.</p> <p>4 Q. Do you think the school district</p> <p>5 is spending too much money on special</p> <p>6 education?</p> <p>7 A. I don't know. I can't say.</p> <p>8 Q. When you were running for</p> <p>9 office, did you tell people how you were</p> <p>10 going to pay for the services that you want</p> <p>11 to bring back to the school district?</p> <p>12 A. The way we looked at how we</p> <p>13 wanted to get services back into the schools</p> <p>14 was we didn't have all the answers. What we</p> <p>15 said was that we would look at the budget</p> <p>16 and see how we could allocate those funds</p> <p>17 appropriately toward services or even see if</p> <p>18 we could reach out to social services and</p> <p>19 see if they would be willing to work with</p> <p>20 whatever funds we were able to allocate</p> <p>21 towards those services.</p> <p>22 Q. When you were a candidate, did</p> <p>23 you ever take a particular position on the</p> <p>24 property tax rates in East Ramapo?</p> <p>25 A. No.</p>
<p style="text-align: right;">Page 19</p> <p>1 Dos Reis</p> <p>2 And so if we have funds for</p> <p>3 infrastructure for schools and what have</p> <p>4 you, why did it take years for them to find</p> <p>5 out that the water was contaminated, why do</p> <p>6 we have stairs falling apart, why do we have</p> <p>7 wires hanging out from the ceiling, why</p> <p>8 don't we have heat in some of the classes,</p> <p>9 why don't we have air-conditioning in some</p> <p>10 of the classrooms.</p> <p>11 Q. Those are all very good</p> <p>12 questions. What is your answer to those</p> <p>13 questions?</p> <p>14 A. We don't know.</p> <p>15 MR. PEARCE: Objection.</p> <p>16 A. We don't know.</p> <p>17 Q. Do you think funds that the</p> <p>18 school district has are being misspent?</p> <p>19 A. I don't know.</p> <p>20 Q. Do you think that the money the</p> <p>21 school district has is being spent on, for</p> <p>22 example, services to students attending</p> <p>23 private schools?</p> <p>24 A. I don't know.</p> <p>25 Q. Do you think the school district</p>	<p style="text-align: right;">Page 21</p> <p>1 Dos Reis</p> <p>2 Q. Do you own a home?</p> <p>3 A. No.</p> <p>4 Q. So you don't pay property taxes?</p> <p>5 A. I would assume it comes out of</p> <p>6 my rent.</p> <p>7 Q. Do you know what the property</p> <p>8 tax rate is in East Ramapo?</p> <p>9 A. No, not right now.</p> <p>10 Q. Did you ever know?</p> <p>11 A. Many years ago, but I don't</p> <p>12 remember what it was.</p> <p>13 Q. So is it fair to say that</p> <p>14 property tax rates were not a major issue</p> <p>15 for you in your campaign for the board of</p> <p>16 education?</p> <p>17 A. It was an issue, but it wasn't</p> <p>18 one of our main issues.</p> <p>19 Q. In what way was it an issue for</p> <p>20 you?</p> <p>21 A. Property taxes, we tackled --</p> <p>22 well, we discussed property taxes with</p> <p>23 individuals in the community that didn't</p> <p>24 have children attending the schools.</p> <p>25 Q. What do you mean by that?</p>

<p style="text-align: right;">Page 22</p> <p>1 Dos Reis</p> <p>2 A. We were trying to get</p> <p>3 information out to the community that it was</p> <p>4 important to come out and vote for school</p> <p>5 board elections even if you don't have</p> <p>6 children in schools. Unfortunately, most</p> <p>7 people think that school board elections are</p> <p>8 only for those who actually have children in</p> <p>9 the schools.</p> <p>10 And so what we did was, you</p> <p>11 know, if a school district is not meeting</p> <p>12 its standards and if it's considered --</p> <p>13 which our school district unfortunately has</p> <p>14 been for quite some time now (sic), it's</p> <p>15 considered a low performing school district,</p> <p>16 then the property taxes are affected by that</p> <p>17 in the sense that people are not going to</p> <p>18 move there.</p> <p>19 So we were trying to get people</p> <p>20 to understand that even though you don't</p> <p>21 have children in the school, it's still</p> <p>22 important to come out and vote based upon,</p> <p>23 you know, having a home, wanting people to</p> <p>24 continue to move into the district because</p> <p>25 it has a flourishing school district. If</p>	<p style="text-align: right;">Page 24</p> <p>1 Dos Reis</p> <p>2 A. No.</p> <p>3 Q. Were you in favor of reducing</p> <p>4 property tax rates?</p> <p>5 A. No. That wasn't -- like I said,</p> <p>6 that wasn't the concern necessarily, like</p> <p>7 what you're saying, increasing or</p> <p>8 decreasing. It was just a matter of getting</p> <p>9 people to -- meeting them where they were</p> <p>10 and getting them to realize how important it</p> <p>11 was to come out and vote in a school</p> <p>12 election.</p> <p>13 Q. Looking back at your declaration</p> <p>14 again at paragraph 18, the same sentence,</p> <p>15 when you say that you ran so that you</p> <p>16 could -- and just to read along -- "ensure</p> <p>17 access to a proper education for my children</p> <p>18 and all of the children attending public</p> <p>19 schools in the district," you don't say</p> <p>20 anything about students attending private</p> <p>21 schools in the district. Why is that?</p> <p>22 A. In this particular sentence, I</p> <p>23 didn't mention private schools; however, I</p> <p>24 do talk later about acquiring academic</p> <p>25 success for all of the students in the</p>
<p style="text-align: right;">Page 23</p> <p>1 Dos Reis</p> <p>2 you want to sell your home, you want to be</p> <p>3 able to get your value for the home.</p> <p>4 Q. When you say you were trying to</p> <p>5 get people to understand that, what people</p> <p>6 specifically?</p> <p>7 A. Well, we campaigned throughout</p> <p>8 East Ramapo.</p> <p>9 Q. Are there any specific people</p> <p>10 that you spoke to about property taxes</p> <p>11 during your campaign?</p> <p>12 A. Specific people? We went in to</p> <p>13 various towns, just knocked on doors. We</p> <p>14 went to specific -- the only specific -- the</p> <p>15 only thing specific about the doors we</p> <p>16 knocked on was that we knew that they were</p> <p>17 voters, they were registered voters in East</p> <p>18 Ramapo.</p> <p>19 Q. When you knocked on people's</p> <p>20 doors, sometimes you would talk about</p> <p>21 property taxes; is that fair?</p> <p>22 A. Yes.</p> <p>23 Q. Was your position as you were</p> <p>24 campaigning in favor of increasing property</p> <p>25 tax rates?</p>	<p style="text-align: right;">Page 25</p> <p>1 Dos Reis</p> <p>2 district.</p> <p>3 Q. So is it your position that as a</p> <p>4 member of the board of education it's part</p> <p>5 of the responsibility of board members to be</p> <p>6 concerned about education of both public and</p> <p>7 private school students?</p> <p>8 A. Absolutely.</p> <p>9 Q. Do you believe that education</p> <p>10 services should be provided to students</p> <p>11 attending private schools?</p> <p>12 A. Yes.</p> <p>13 Q. Do you know how many private</p> <p>14 school students there are in East Ramapo?</p> <p>15 A. About 33,000.</p> <p>16 Q. Do you know how many public</p> <p>17 school students there are in East Ramapo?</p> <p>18 A. Almost 9,000.</p> <p>19 Q. If I use the term "universal</p> <p>20 busing," do you know what that is?</p> <p>21 A. Yes.</p> <p>22 Q. What is universal busing?</p> <p>23 A. Universal busing is the fact</p> <p>24 that you're not restricted when it comes to</p> <p>25 dropping off and picking up your child from</p>

<p style="text-align: right;">Page 26</p> <p>1 Dos Reis</p> <p>2 one location to the other. Universal busing</p> <p>3 is that if you have your child at an</p> <p>4 after-school program that's outside the</p> <p>5 child's school district that they could</p> <p>6 still be bused there.</p> <p>7 Q. Do you know whether the East</p> <p>8 Ramapo School District currently has a</p> <p>9 universal busing policy?</p> <p>10 A. Yes, it does.</p> <p>11 Q. As a candidate, did you ever</p> <p>12 take a position on whether East Ramapo</p> <p>13 should maintain its universal busing policy?</p> <p>14 A. During the campaign, I don't</p> <p>15 believe we brought that up.</p> <p>16 Q. Earlier you mentioned in your</p> <p>17 testimony, correct me if I'm not</p> <p>18 paraphrasing correctly, that you were</p> <p>19 interested in trying to bring together</p> <p>20 parents of -- public school parents and</p> <p>21 private school parents; is that a fair</p> <p>22 summary?</p> <p>23 A. Yes.</p> <p>24 Q. Does that mean that you think</p> <p>25 that there is a divide between public school</p>	<p style="text-align: right;">Page 28</p> <p>1 Dos Reis</p> <p>2 and Hasidic Jews that live in East Ramapo?</p> <p>3 A. They are part of the private</p> <p>4 school community.</p> <p>5 Q. Who is else part of the private</p> <p>6 school community?</p> <p>7 A. Parents who send their children</p> <p>8 to Catholic schools.</p> <p>9 Q. Anybody else?</p> <p>10 A. No, I only know of those two.</p> <p>11 Q. Do you have a sense for how many</p> <p>12 people there are in the private school</p> <p>13 community?</p> <p>14 A. Yes. I believe there are 33,000</p> <p>15 or somewhere around there that are private</p> <p>16 school students.</p> <p>17 Q. Right. Total, how many people</p> <p>18 total are in that community?</p> <p>19 A. No.</p> <p>20 Q. More than 33,000, right?</p> <p>21 A. Well, the students are roughly</p> <p>22 33,000, so there would be obviously more</p> <p>23 private school community members if you're</p> <p>24 incorporating everyone, yes.</p> <p>25 Q. In the same paragraph, paragraph</p>
<p style="text-align: right;">Page 27</p> <p>1 Dos Reis</p> <p>2 parents and private school parents?</p> <p>3 A. I don't know if there is</p> <p>4 necessarily a divide, but there isn't a lot</p> <p>5 of communication.</p> <p>6 Q. Why do you think that is?</p> <p>7 MR. PEARCE: Objection.</p> <p>8 A. I don't know.</p> <p>9 Q. There are a few instances in</p> <p>10 your declaration where you use a phrase</p> <p>11 "private school community"; does that sound</p> <p>12 familiar?</p> <p>13 A. Yes.</p> <p>14 Q. So one example is in paragraph</p> <p>15 21, just if you wanted a specific example,</p> <p>16 towards the bottom of the paragraph.</p> <p>17 A. Um-hum.</p> <p>18 Q. What do you mean when you say</p> <p>19 "private school community"?</p> <p>20 A. The private school community?</p> <p>21 Q. Um-hum.</p> <p>22 A. I'm speaking about those who</p> <p>23 send their children to private schools.</p> <p>24 Q. When you say "the private school</p> <p>25 community," are you referring to Orthodox</p>	<p style="text-align: right;">Page 29</p> <p>1 Dos Reis</p> <p>2 21, the phrase that you use is the "White</p> <p>3 private school community." What do you mean</p> <p>4 by that?</p> <p>5 A. All right. So this particular</p> <p>6 paragraph is about a meeting that myself and</p> <p>7 the other two candidates were invited to at</p> <p>8 the Green Meadow Waldorf School in Chestnut</p> <p>9 Ridge. The meeting was facilitated by two,</p> <p>10 I want to say, Hasidic, and I say "that I'm</p> <p>11 not sure" because I want to say one lady</p> <p>12 might be Orthodox and the other lady was</p> <p>13 definitely from the Hasidic community, and</p> <p>14 they facilitated a meeting with myself and</p> <p>15 the other two candidates to speak to other</p> <p>16 members of the Hasidic community.</p> <p>17 And this was something they</p> <p>18 wanted to do, the two ladies, because they</p> <p>19 said that they felt there was a divide</p> <p>20 between the Hasidic community and, I guess,</p> <p>21 those of us of the secular community, and</p> <p>22 they wanted us to be able to come together</p> <p>23 and speak at this particular location.</p> <p>24 And when I said that, however,</p> <p>25 almost no one from the White private school</p>

<p style="text-align: right;">Page 30</p> <p>1 Dos Reis</p> <p>2 community attended the event, I'm speaking</p> <p>3 to those who were invited, and the only</p> <p>4 other people who were invited, aside from</p> <p>5 myself and the other two candidates, and</p> <p>6 whoever we wanted to bring, were from the</p> <p>7 Hasidic community. That was for this</p> <p>8 particular event.</p> <p>9 Q. I certainly want to talk about</p> <p>10 this, and I have some questions about it.</p> <p>11 A. Okay.</p> <p>12 Q. In this paragraph, when you use</p> <p>13 the phrase, "White private school</p> <p>14 community," specifically you're referring to</p> <p>15 members of Hasidic community?</p> <p>16 A. In this case, yes.</p> <p>17 Q. In this paragraph, okay.</p> <p>18 So in paragraph 21, when you use</p> <p>19 the phrase, "White private school</p> <p>20 community," that means the Hasidic</p> <p>21 community, right?</p> <p>22 A. Yes.</p> <p>23 Q. Who invited you to the events at</p> <p>24 the Green Meadow Waldorf School?</p> <p>25 A. It was two women.</p>	<p style="text-align: right;">Page 32</p> <p>1 Dos Reis</p> <p>2 people to able to reach out to us.</p> <p>3 Q. Do you still have that e-mail?</p> <p>4 A. What e-mail? You mean the</p> <p>5 specific e-mail or e-mail address?</p> <p>6 Q. Both.</p> <p>7 A. Yes.</p> <p>8 Q. So you still maintain that</p> <p>9 e-mail account, right?</p> <p>10 A. Yes.</p> <p>11 Q. And you still have that specific</p> <p>12 e-mail where Ms. Shani and Ms. Kressel</p> <p>13 e-mailed you?</p> <p>14 A. They e-mailed the group, yes.</p> <p>15 Q. In that e-mail they invited you</p> <p>16 and the other candidates to attend an event</p> <p>17 at the Green Meadow Waldorf School, right?</p> <p>18 A. Yes.</p> <p>19 Q. Were there any other</p> <p>20 communications you had with them?</p> <p>21 A. Aside from e-mail, no. E-mail.</p> <p>22 Q. Had you ever met them before?</p> <p>23 A. No, not prior to the candidacy,</p> <p>24 the campaign.</p> <p>25 Q. Did you attend the event?</p>
<p style="text-align: right;">Page 31</p> <p>1 Dos Reis</p> <p>2 Q. Do you remember their names?</p> <p>3 A. Yes. Shani, S-H-A-N-I, and</p> <p>4 Kressel, K-R-E-S-S-E-L. I don't remember</p> <p>5 their last names.</p> <p>6 Q. Those are first names?</p> <p>7 A. Yes.</p> <p>8 Q. If I say Ms. Shani and</p> <p>9 Ms. Kressel?</p> <p>10 A. That's fine.</p> <p>11 Q. All right.</p> <p>12 How do you know them?</p> <p>13 A. They approached our slate,</p> <p>14 myself, Eric and Allie and Strong East</p> <p>15 Ramapo.</p> <p>16 Q. So they reached out to you?</p> <p>17 A. Yes.</p> <p>18 Q. Did they call you?</p> <p>19 A. I know that we had some e-mails</p> <p>20 that went back and forth.</p> <p>21 Q. Who e-mailed you?</p> <p>22 A. Miss Shani and Miss Kressel</p> <p>23 e-mailed Strong East Ramapo. As we were</p> <p>24 running, we had an e-mail and a website and</p> <p>25 a Facebook page that we put out there for</p>	<p style="text-align: right;">Page 33</p> <p>1 Dos Reis</p> <p>2 A. Yes.</p> <p>3 Q. What happened?</p> <p>4 A. Well, myself and the other two</p> <p>5 candidates were there, Ms. Kressel,</p> <p>6 Ms. Shani, and there were a few, just a few,</p> <p>7 maybe three or four other parents that came,</p> <p>8 and I believe they were all from the Waldorf</p> <p>9 School community. And that while we were</p> <p>10 there, we just, you know, decided -- we let</p> <p>11 Ms. Shani and Ms. Kressel facilitate it. We</p> <p>12 were sad and disappointed that the people</p> <p>13 that Ms. Kressel and Ms. Shani wanted to be</p> <p>14 there didn't show.</p> <p>15 Q. How many people in total were</p> <p>16 there?</p> <p>17 A. Maybe ten.</p> <p>18 Q. Three or four, when you say,</p> <p>19 were parents from the Waldorf community, so</p> <p>20 you mean they were not from the Hasidic</p> <p>21 community?</p> <p>22 A. No.</p> <p>23 Q. And Shani and Kressel were</p> <p>24 there, right?</p> <p>25 A. Um-hum.</p>

<p style="text-align: right;">Page 34</p> <p>1 Dos Reis</p> <p>2 Q. And you were there?</p> <p>3 A. Um-hum.</p> <p>4 Q. Were the other two folks that</p> <p>5 you ran with for the board there as well?</p> <p>6 A. Yes.</p> <p>7 Q. Was there anyone else there?</p> <p>8 A. Yes. There was one other lady</p> <p>9 there. There was one other lady there.</p> <p>10 Q. Do you remember who that was?</p> <p>11 A. No.</p> <p>12 Q. Was she from the Hasidic</p> <p>13 community?</p> <p>14 A. No.</p> <p>15 Q. Besides Ms. Shani and</p> <p>16 Ms. Kressel, was there anybody there from</p> <p>17 the Orthodox or Hasidic Jewish communities?</p> <p>18 A. No.</p> <p>19 Q. So when you say in paragraph 21,</p> <p>20 "Almost no one from the White private school</p> <p>21 community attended the event," what you mean</p> <p>22 is that only Shani and Kressel from the</p> <p>23 Orthodox and Hasidic Jewish community came</p> <p>24 to the event, right?</p> <p>25 MR. PEARCE: Objection.</p>	<p style="text-align: right;">Page 36</p> <p>1 Dos Reis</p> <p>2 A. Yes.</p> <p>3 Q. Do you know whether they, in</p> <p>4 fact, handed out the campaign literature?</p> <p>5 A. Yes.</p> <p>6 Q. They did?</p> <p>7 A. Yes.</p> <p>8 Q. What do you mean by</p> <p>9 "predominantly White neighborhoods"?</p> <p>10 A. They went into the neighborhoods</p> <p>11 where they knew specifically private school</p> <p>12 parents live.</p> <p>13 Q. Do you know what neighborhoods?</p> <p>14 A. Ms. Kressel was going into</p> <p>15 Monsey and Kaser, I want to say, and</p> <p>16 Ms. Shani wanted to speak with the parents</p> <p>17 from Wesley Hills, and I'm not sure what</p> <p>18 other areas she tackled. I know for sure</p> <p>19 Wesley Hills.</p> <p>20 Q. So is it fair to say when you</p> <p>21 say "predominantly White neighborhoods," you</p> <p>22 mean Orthodox and Hasidic Jewish</p> <p>23 neighborhoods?</p> <p>24 MR. PEARCE: Objection.</p> <p>25 A. Not necessarily, but yes, it</p>
<p style="text-align: right;">Page 35</p> <p>1 Dos Reis</p> <p>2 A. Yeah, I was going to say, I mean</p> <p>3 that I know of that they identified</p> <p>4 themselves as White, so it's White.</p> <p>5 Q. I'm just trying to understand if</p> <p>6 in this paragraph "the White private school</p> <p>7 community" refers to the Hasidic community,</p> <p>8 and almost no one from the Hasidic community</p> <p>9 attended the event, how many people is</p> <p>10 "almost no one"?</p> <p>11 A. Only Ms. Kressel and Ms. Shani</p> <p>12 were there.</p> <p>13 Q. So they were the only people</p> <p>14 from the Orthodox or Hasidic Jewish</p> <p>15 community, right?</p> <p>16 A. Yes.</p> <p>17 Q. You also say in paragraph 21</p> <p>18 that "two people offered to hand out</p> <p>19 campaign literature in predominantly White</p> <p>20 neighborhoods." So are the two people you</p> <p>21 refer to in that sentence Ms. Kressel and</p> <p>22 Ms. Shani?</p> <p>23 A. Yes.</p> <p>24 Q. Did you give them campaign</p> <p>25 literature to hand out?</p>	<p style="text-align: right;">Page 37</p> <p>1 Dos Reis</p> <p>2 would include them.</p> <p>3 Q. Is Monsey a primarily Jewish</p> <p>4 neighborhood?</p> <p>5 MR. PEARCE: Objection.</p> <p>6 If you know.</p> <p>7 A. Monsey is diverse.</p> <p>8 Q. What about Kaser, do you know</p> <p>9 whether Kaser is a primarily Jewish</p> <p>10 neighborhood?</p> <p>11 A. I don't know.</p> <p>12 Q. What about Wesley Hills?</p> <p>13 A. I don't know.</p> <p>14 Q. You don't know anything about</p> <p>15 who lives in Wesley Hills?</p> <p>16 MR. PEARCE: Objection.</p> <p>17 A. I don't know what the makeup is</p> <p>18 exactly.</p> <p>19 Q. Do you know anything about the</p> <p>20 people that live in the Kaser neighborhood?</p> <p>21 A. No.</p> <p>22 Q. Nothing at all?</p> <p>23 A. I know that private school</p> <p>24 parents live there, but I don't know</p> <p>25 anything of --</p>

<p style="text-align: right;">Page 38</p> <p>1 Dos Reis</p> <p>2 Q. How do you know that private</p> <p>3 school parents live there?</p> <p>4 A. Because Ms. Kressel told me.</p> <p>5 Q. In paragraph 21 you say "I did</p> <p>6 not campaign personally in these</p> <p>7 predominantly White areas because as a</p> <p>8 Latina I did not feel welcome there"?</p> <p>9 A. That is correct.</p> <p>10 Q. Why didn't you feel welcome</p> <p>11 there if you don't know anything about the</p> <p>12 people that lived there?</p> <p>13 A. I didn't feel welcome in those</p> <p>14 particular areas because when Ms. Kressel</p> <p>15 and Ms. Shani invited people from -- who</p> <p>16 live in those particular areas, and they</p> <p>17 didn't come, that was a red flag.</p> <p>18 When the community leaders from</p> <p>19 Martin Luther King Center and from the NAACP</p> <p>20 invited people who live in these particular</p> <p>21 communities and they refused to come, I said</p> <p>22 to myself, you know what, clearly people who</p> <p>23 live in these particular areas who have been</p> <p>24 invited to different forums don't want to</p> <p>25 come, then maybe we're not welcome, and I</p>	<p style="text-align: right;">Page 40</p> <p>1 Dos Reis</p> <p>2 Square. They're very closed off, very</p> <p>3 private. That's all I know, is that they're</p> <p>4 very private.</p> <p>5 Q. Are the people who live in New</p> <p>6 Square Orthodox Jews?</p> <p>7 A. I do understand that there is a</p> <p>8 Jewish community there. I don't know if</p> <p>9 they're Orthodox or Hasidic. I don't know</p> <p>10 what the sect is.</p> <p>11 Q. Did you feel uncomfortable going</p> <p>12 to New Square?</p> <p>13 A. Once the invitations were</p> <p>14 declined or just flat out ignored and</p> <p>15 Ms. Kressel felt that she and Ms. Shani</p> <p>16 would be better received, yeah, it added to</p> <p>17 already the feeling of not being welcome.</p> <p>18 Q. When you say the invitation, you</p> <p>19 mean the invitation to the events that</p> <p>20 Ms. Shani and Ms. Kressel invited you to?</p> <p>21 A. That event and others.</p> <p>22 Q. Do you know how many people were</p> <p>23 invited to that event?</p> <p>24 A. A lot.</p> <p>25 Q. How many people?</p>
<p style="text-align: right;">Page 39</p> <p>1 Dos Reis</p> <p>2 just wanted to stay away, aside from --</p> <p>3 that's really what it was.</p> <p>4 Q. Did Ms. Shani or Ms. Kressel</p> <p>5 tell you that you wouldn't be welcome in</p> <p>6 their neighborhoods?</p> <p>7 A. When we were discussing</p> <p>8 campaigning, I wanted to go -- I was willing</p> <p>9 to take a chance and go to New Square and</p> <p>10 Monsey, and Ms. Kressel did say that she</p> <p>11 thought that she and Ms. Shani would be</p> <p>12 better received in those particular</p> <p>13 communities. She did think that they would</p> <p>14 be better received.</p> <p>15 Q. Did she tell you why she thought</p> <p>16 that?</p> <p>17 A. No.</p> <p>18 Q. Do you have any idea --</p> <p>19 MR. PEARCE: Objection.</p> <p>20 Q. -- why that might be the case?</p> <p>21 A. No.</p> <p>22 Q. What do you know about -- if</p> <p>23 anything, what do you know about the people</p> <p>24 who live in New Square?</p> <p>25 A. I don't know much about New</p>	<p style="text-align: right;">Page 41</p> <p>1 Dos Reis</p> <p>2 A. I don't know exactly how many.</p> <p>3 Q. How do you know that a lot of</p> <p>4 people were invited?</p> <p>5 A. Because the e-mail that was</p> <p>6 sent, when you look at the list of people it</p> <p>7 was sent to, there were at least a hundred</p> <p>8 names, at least, and that was community</p> <p>9 leaders, that included community leaders,</p> <p>10 and they were also asked to then spread the</p> <p>11 word within their communities, and so a lot</p> <p>12 of people were invited.</p> <p>13 Q. What do you mean by "community</p> <p>14 leaders"?</p> <p>15 A. Community leaders, we asked --</p> <p>16 we asked -- that I understand, Ms. Kressel</p> <p>17 and Ms. Shani invited people from the</p> <p>18 private school community that they knew</p> <p>19 spearheaded, I guess, different types of</p> <p>20 organizations like NAACP on our side or MLK,</p> <p>21 organizations that they were familiar with.</p> <p>22 Those community leaders were invited and</p> <p>23 other people. Ms. Kressel and Ms. Shani</p> <p>24 know a lot of people. And in the e-mails</p> <p>25 that were sent back and forth inviting</p>

<p style="text-align: right;">Page 42</p> <p>1 Dos Reis</p> <p>2 individuals to, let's say, this particular</p> <p>3 event, it was quite a list.</p> <p>4 Q. Do you still have that e-mail</p> <p>5 with the invitation?</p> <p>6 A. Yes.</p> <p>7 Q. How many people did you invite</p> <p>8 to the meeting?</p> <p>9 A. I didn't invite anyone</p> <p>10 specifically because the two ladies were</p> <p>11 facilitating the event, so...</p> <p>12 Q. You said that three or four</p> <p>13 people from the Waldorf community came?</p> <p>14 A. Uh-hum.</p> <p>15 Q. Who invited them?</p> <p>16 A. Yes. I would assume</p> <p>17 Ms. Shani -- I believe Ms. Shani and</p> <p>18 Ms. Kressel. Like I said, they were the two</p> <p>19 who facilitated the event.</p> <p>20 Q. So no one on your slate, on your</p> <p>21 side of the slate invited anyone to attend</p> <p>22 this?</p> <p>23 MR. PEARCE: Objection.</p> <p>24 A. No.</p> <p>25 Q. You can answer.</p>	<p style="text-align: right;">Page 44</p> <p>1 Dos Reis</p> <p>2 A. About that it would have been,</p> <p>3 um-hum.</p> <p>4 Q. Do you know why the people who</p> <p>5 were invited didn't attend?</p> <p>6 MR. PEARCE: Objection.</p> <p>7 A. No, I don't know.</p> <p>8 Q. Did you talk about it with</p> <p>9 Ms. Kressel or Ms. Shani?</p> <p>10 A. We discussed it in the sense</p> <p>11 that we all expressed how disappointed we</p> <p>12 were that no one else came to the event, but</p> <p>13 that was the extent of it.</p> <p>14 Q. Were there any communications</p> <p>15 with Ms. Shani or Ms. Kressel after this</p> <p>16 meeting?</p> <p>17 A. Yes, um-hum.</p> <p>18 Q. Okay. About how many?</p> <p>19 A. We communicated back and forth</p> <p>20 maybe three, four times after that.</p> <p>21 Q. How did you communicate?</p> <p>22 A. Via e-mail.</p> <p>23 Q. You still have those e-mails?</p> <p>24 A. Yes.</p> <p>25 Q. Just generally, if you recall,</p>
<p style="text-align: right;">Page 43</p> <p>1 Dos Reis</p> <p>2 A. No.</p> <p>3 Q. What was the date of the event,</p> <p>4 if you remember?</p> <p>5 A. I don't remember the date.</p> <p>6 Q. Do you remember what day of the</p> <p>7 week it was?</p> <p>8 A. No.</p> <p>9 Q. Was it on the weekend?</p> <p>10 A. It was during the week, but I</p> <p>11 don't remember the date.</p> <p>12 Q. Middle of the week sound right?</p> <p>13 A. I don't remember.</p> <p>14 Q. Do you remember what month?</p> <p>15 A. No. It would have been between</p> <p>16 March -- it would have been either March or</p> <p>17 April.</p> <p>18 Q. Do you know what time?</p> <p>19 A. Evening.</p> <p>20 Q. Does 5 p.m. sound right?</p> <p>21 MR. PEARCE: Objection.</p> <p>22 A. No.</p> <p>23 Q. 6 p.m.?</p> <p>24 A. 7.</p> <p>25 Q. About 7 p.m. sounds right?</p>	<p style="text-align: right;">Page 45</p> <p>1 Dos Reis</p> <p>2 what were you talking about with them?</p> <p>3 A. Communication after the event</p> <p>4 was just about how they could continue to</p> <p>5 help with the campaign.</p> <p>6 Q. Did they continue to help with</p> <p>7 the campaign?</p> <p>8 A. Yes.</p> <p>9 Q. What did they do?</p> <p>10 A. They took campaign material and</p> <p>11 distributed it amongst people that they knew</p> <p>12 and within neighborhoods that they felt</p> <p>13 comfortable in door knocking in.</p> <p>14 Q. What campaign materials did you</p> <p>15 give them?</p> <p>16 A. We had flyers with mine and the</p> <p>17 other two candidates' faces, our names and</p> <p>18 our platform.</p> <p>19 Q. Do you still have those?</p> <p>20 A. Yes.</p> <p>21 Q. What did it say on the flyer?</p> <p>22 A. Like I said, our names -- just</p> <p>23 as much as we could get in the space that we</p> <p>24 had of our platform and our faces, so that</p> <p>25 people could put the name to the face.</p>

<p style="text-align: right;">Page 46</p> <p>1 Dos Reis</p> <p>2 Q. Do you recall specifically what</p> <p>3 from your platform it said on the flyers?</p> <p>4 A. No.</p> <p>5 Q. Do you recall generally what the</p> <p>6 message was?</p> <p>7 A. We pushed diversity, inclusion</p> <p>8 and transparency.</p> <p>9 Q. Do you think that message of</p> <p>10 diversity, inclusion and transparency is</p> <p>11 something that would be appealing to the</p> <p>12 private school parents?</p> <p>13 MR. PEARCE: Objection.</p> <p>14 A. It was our hope, but I don't</p> <p>15 know.</p> <p>16 Q. Do you have a sense for what the</p> <p>17 private school community's political</p> <p>18 preferences are for the board of education?</p> <p>19 A. No.</p> <p>20 Q. Do you have a sense for what</p> <p>21 kind of education policies the private</p> <p>22 school community supports?</p> <p>23 A. I'm sorry, say that again.</p> <p>24 Q. Yes.</p> <p>25 Do you have a sense for what</p>	<p style="text-align: right;">Page 48</p> <p>1 Dos Reis</p> <p>2 non-White?</p> <p>3 A. I don't know the percentage.</p> <p>4 Q. Ballpark?</p> <p>5 MS. CALABRESE: Objection.</p> <p>6 Q. If you want to estimate.</p> <p>7 A. About 80 percent.</p> <p>8 Q. Does that mean that if you had</p> <p>9 to estimate, about 20 percent would be</p> <p>10 White?</p> <p>11 A. I guess if I had to estimate,</p> <p>12 maybe about that.</p> <p>13 Q. Is there a political divide</p> <p>14 between the private school community and the</p> <p>15 public school community?</p> <p>16 A. I don't know.</p> <p>17 Q. Do you think that the private</p> <p>18 school community and the public school</p> <p>19 community want different things for the</p> <p>20 public school district?</p> <p>21 MS. CALABRESE: Objection.</p> <p>22 A. Yeah, I don't know what the</p> <p>23 private school community wants for the</p> <p>24 public school community.</p> <p>25 Q. Did you do anything to try to</p>
<p style="text-align: right;">Page 47</p> <p>1 Dos Reis</p> <p>2 kind of policy preferences the private</p> <p>3 school parents support?</p> <p>4 A. No.</p> <p>5 Q. Do you have a sense for the</p> <p>6 private school community's position on</p> <p>7 property taxes?</p> <p>8 A. No.</p> <p>9 Q. Do you have a sense for the</p> <p>10 private school community's position on</p> <p>11 school district busing programs?</p> <p>12 A. No.</p> <p>13 Q. To the best of your knowledge,</p> <p>14 is everyone in the private school community</p> <p>15 White?</p> <p>16 A. I don't know.</p> <p>17 Q. When you say the public school</p> <p>18 community, is everyone in the public school</p> <p>19 community non-White?</p> <p>20 A. No, not everyone.</p> <p>21 Q. Is there a mix of people in the</p> <p>22 public school community?</p> <p>23 A. Yes.</p> <p>24 Q. If you know, about what</p> <p>25 percentage of the public school community is</p>	<p style="text-align: right;">Page 49</p> <p>1 Dos Reis</p> <p>2 find out?</p> <p>3 A. Yes.</p> <p>4 Q. What did you do?</p> <p>5 A. Well, when we set up for door</p> <p>6 knocking, we had set up to door knock on as</p> <p>7 many doors as possible of those who are</p> <p>8 registered voters, which would be anyone</p> <p>9 from the private or public school</p> <p>10 communities, but as I said, when Ms. Kressel</p> <p>11 stated as she thought that her and Shani</p> <p>12 would be better received in certain</p> <p>13 communities, specifically where private</p> <p>14 school parents lived, then that's when we</p> <p>15 held off. Initially we wanted to, but then</p> <p>16 we held off.</p> <p>17 Q. By "private school parents" in</p> <p>18 that context, you mean Orthodox and Hasidic</p> <p>19 Jews, right?</p> <p>20 MR. PEARCE: Objection.</p> <p>21 A. Not necessarily. It was just</p> <p>22 anyone from the private school community for</p> <p>23 the most part.</p> <p>24 Q. Is there some reason why you</p> <p>25 think Ms. Kressel or Ms. Shani would be more</p>

<p style="text-align: right;">Page 50</p> <p>1 Dos Reis</p> <p>2 well received by Catholic school parents</p> <p>3 than you?</p> <p>4 A. Their concern -- I don't --</p> <p>5 their concern wasn't so much with the</p> <p>6 Catholic school community.</p> <p>7 Q. So in that context when you</p> <p>8 refer to the private school community, you</p> <p>9 mean the Orthodox and Hasidic Jewish</p> <p>10 community, right?</p> <p>11 A. Yes.</p> <p>12 MR. PEARCE: Objection.</p> <p>13 Q. Thank you.</p> <p>14 Do you feel uncomfortable</p> <p>15 talking about the Hasidic and Orthodox</p> <p>16 Jewish community?</p> <p>17 A. No.</p> <p>18 Q. Why do you use the phrase</p> <p>19 "private school community" instead of</p> <p>20 referring to the Orthodox and Hasidic Jewish</p> <p>21 community?</p> <p>22 A. Because the Orthodox and the</p> <p>23 Hasidic community aren't the only</p> <p>24 communities who send their children to</p> <p>25 private school.</p>	<p style="text-align: right;">Page 52</p> <p>1 Dos Reis</p> <p>2 MR. PEARCE: Objection.</p> <p>3 Q. Tell me about your slate. Your</p> <p>4 slate was called The Power of Ten slate; is</p> <p>5 that right?</p> <p>6 A. No.</p> <p>7 Q. Did your slate have a name?</p> <p>8 A. No. We were just considered a</p> <p>9 slate because we were -- when we were</p> <p>10 collecting signatures, we collected</p> <p>11 signatures for each other, and also like we</p> <p>12 went and said, okay, these are the three</p> <p>13 candidates who are running for school board,</p> <p>14 and we did it together. That's why it was</p> <p>15 considered a slate.</p> <p>16 Q. Is there some formal process you</p> <p>17 have to go through to be a slate?</p> <p>18 A. To be a slate, no. We decided</p> <p>19 to run together; however, there was a</p> <p>20 process.</p> <p>21 Q. What is the process?</p> <p>22 A. To -- how do you say that?</p> <p>23 To -- like when I -- when I announced my</p> <p>24 candidacy, I did so at a forum that was put</p> <p>25 together by Strong East Ramapo and Power of</p>
<p style="text-align: right;">Page 51</p> <p>1 Dos Reis</p> <p>2 Q. In your mind, what is important</p> <p>3 is that they send their kids to private</p> <p>4 school?</p> <p>5 A. No.</p> <p>6 (Record read.)</p> <p>7 Q. In terms of school district</p> <p>8 politics, what's important is that they send</p> <p>9 their kids to private school, is that what</p> <p>10 you mean?</p> <p>11 MS. CALABRESE: Objection.</p> <p>12 A. I don't know what you mean.</p> <p>13 Q. I'm trying to understand, right,</p> <p>14 because -- what about sending kids to</p> <p>15 private school is so significant to you?</p> <p>16 A. Nothing, aside from the fact</p> <p>17 that we wanted to have better communication</p> <p>18 between public school parents and private</p> <p>19 school parents. That's it.</p> <p>20 Q. Do you think there is not good</p> <p>21 communication now?</p> <p>22 A. There's very little that I know</p> <p>23 of.</p> <p>24 Q. Why do you think that is?</p> <p>25 A. I don't know.</p>	<p style="text-align: right;">Page 53</p> <p>1 Dos Reis</p> <p>2 Ten.</p> <p>3 Q. Is that part of the slate</p> <p>4 process?</p> <p>5 A. No.</p> <p>6 Q. What is Strong East Ramapo?</p> <p>7 A. Strong East Ramapo is an</p> <p>8 organization that came together for -- it's</p> <p>9 an organization made up of community leaders</p> <p>10 in East Ramapo who came together to fight</p> <p>11 for the rights of the students in East</p> <p>12 Ramapo.</p> <p>13 Q. About how many -- does Strong</p> <p>14 East Ramapo have members?</p> <p>15 A. Currently, yes, we are official</p> <p>16 this year.</p> <p>17 Q. About how many members does</p> <p>18 Strong East Ramapo have?</p> <p>19 A. Members, I don't know the number</p> <p>20 right now offhand. I mean, Strong East</p> <p>21 Ramapo has been official for a couple of</p> <p>22 years in the sense that they have the</p> <p>23 Facebook page, they have a following, but I</p> <p>24 mean, official in the sense that we actually</p> <p>25 have an executive board started this year.</p>

<p style="text-align: right;">Page 54</p> <p>1 Dos Reis</p> <p>2 Q. Who is on the executive board?</p> <p>3 A. Myself, Steven White, Andrew</p> <p>4 Mandel and Yolanda Leon.</p> <p>5 Q. Anyone else?</p> <p>6 A. That is the -- well, we just</p> <p>7 added Alexandra Manigo.</p> <p>8 Q. Does a person have to do</p> <p>9 anything in particular to become a member of</p> <p>10 Strong East Ramapo?</p> <p>11 A. A member, no. They just -- they</p> <p>12 go to the website and ask to become a</p> <p>13 member. That's it.</p> <p>14 Q. Would you be able to find out</p> <p>15 how many members Strong East Ramapo has?</p> <p>16 A. Well, we have a following on</p> <p>17 Facebook. We have the numbers on Facebook</p> <p>18 as to how many members we have on there.</p> <p>19 Yes, yes, I guess like altogether with our</p> <p>20 e-mail server and Facebook, yes, we could</p> <p>21 probably get the exact number.</p> <p>22 Q. Are all of the members of Strong</p> <p>23 East Ramapo voters registered in East</p> <p>24 Ramapo?</p> <p>25 MR. PEARCE: Objection.</p>	<p style="text-align: right;">Page 56</p> <p>1 Dos Reis</p> <p>2 sends it out to everyone who has enlisted --</p> <p>3 Q. Is Power of Ten an organization?</p> <p>4 A. -- in Power of Ten.</p> <p>5 Not an organization, no.</p> <p>6 Q. Is it like a newsletter?</p> <p>7 A. Yes, something like that.</p> <p>8 Q. So when you say "members," do</p> <p>9 you mean people who like subscribe to Power</p> <p>10 of Ten?</p> <p>11 A. Yes.</p> <p>12 Q. I see. I understand.</p> <p>13 Did Power of Ten endorse your</p> <p>14 slate?</p> <p>15 A. Yeah, I guess you would say so.</p> <p>16 I don't know if "endorse" is the right word.</p> <p>17 Q. Did Power of Ten sponsor your</p> <p>18 slate?</p> <p>19 A. No, we didn't get any money from</p> <p>20 Power of Ten, if that's what you mean.</p> <p>21 Q. Well, was Power of Ten involved</p> <p>22 at all in your slate's campaign?</p> <p>23 A. Yes, in the sense of putting</p> <p>24 information out there as to when we were</p> <p>25 going to have a forum or debate or -- that's</p>
<p style="text-align: right;">Page 55</p> <p>1 Dos Reis</p> <p>2 A. No.</p> <p>3 Q. So you don't have to be an East</p> <p>4 Ramapo voter to be a member of Strong East</p> <p>5 Ramapo?</p> <p>6 A. Correct.</p> <p>7 Q. What about Power of Ten, what is</p> <p>8 that?</p> <p>9 A. Power of Ten is a -- not a</p> <p>10 database, but Power of Ten is made up of one</p> <p>11 person who was very active in the community,</p> <p>12 and any information that he acquires, be it</p> <p>13 at meetings, forums, what have you, he then</p> <p>14 puts it in an e-mail blast to anyone who</p> <p>15 wants to be a member of Power of Ten so that</p> <p>16 they can get current information of what is</p> <p>17 going on in East Ramapo.</p> <p>18 Q. Who is the one person?</p> <p>19 A. Steven White.</p> <p>20 Q. Does Power of Ten have members?</p> <p>21 A. Yes.</p> <p>22 Q. So Power of Ten is not just one</p> <p>23 person?</p> <p>24 A. Well, it's the one person who</p> <p>25 puts all the information together and then</p>	<p style="text-align: right;">Page 57</p> <p>1 Dos Reis</p> <p>2 it, just putting out there when we were</p> <p>3 going to have forums or debates or an event</p> <p>4 so that, you know whoever would want to come</p> <p>5 and attend would be able to have that</p> <p>6 information.</p> <p>7 Q. Does Power of Ten advocate any</p> <p>8 particular policy perspective?</p> <p>9 A. Does Power of Ten have any</p> <p>10 policy perspective?</p> <p>11 Q. Yeah.</p> <p>12 MS. CALABRESE: Objection.</p> <p>13 Q. Yeah, I can do that better.</p> <p>14 Does Power of Ten advocate for</p> <p>15 any particular policies with respect to</p> <p>16 education in East Ramapo?</p> <p>17 A. Policy wise, I honestly don't</p> <p>18 know. I just started following Power of Ten</p> <p>19 a few years ago, but it has been around much</p> <p>20 longer. So I don't know exactly.</p> <p>21 Q. What about Strong East Ramapo?</p> <p>22 A. Strong East Ramapo doesn't</p> <p>23 take -- we don't deal with policies. Strong</p> <p>24 East Ramapo is just about trying to</p> <p>25 communicate with the board or anyone else</p>

<p style="text-align: right;">Page 58</p> <p>1 Dos Reis</p> <p>2 involved with education.</p> <p>3 Q. Does Strong East Ramapo take</p> <p>4 positions on political issues?</p> <p>5 A. No.</p> <p>6 Q. Was Strong East Ramapo involved</p> <p>7 in any way in your political campaign?</p> <p>8 A. Yes.</p> <p>9 Q. How was Strong East Ramapo</p> <p>10 involved?</p> <p>11 A. Well, through Strong East Ramapo</p> <p>12 we had fundraisers and through Strong East</p> <p>13 Ramapo we were able to obtain information as</p> <p>14 to who were eligible voters in East Ramapo.</p> <p>15 That was it. Like just -- you know, just</p> <p>16 the support in putting on forums and events</p> <p>17 and so forth. But it was, you know, just so</p> <p>18 that we were able to get the information out</p> <p>19 to as many people as possible.</p> <p>20 Q. What information?</p> <p>21 A. About, you know, events</p> <p>22 happening, debates. We just wanted to be</p> <p>23 able to let everyone in East Ramapo know who</p> <p>24 was running and when the election was taking</p> <p>25 place.</p>	<p style="text-align: right;">Page 60</p> <p>1 Dos Reis</p> <p>2 where my heart was, and what my intentions</p> <p>3 were if I was to become school board member.</p> <p>4 Q. What do you think about the</p> <p>5 current East Ramapo school board?</p> <p>6 MR. PEARCE: Objection.</p> <p>7 A. I feel that with the current</p> <p>8 school board we could use more transparency</p> <p>9 and better communication.</p> <p>10 Q. Anything else?</p> <p>11 A. No.</p> <p>12 Q. There is nothing else that you</p> <p>13 would do differently?</p> <p>14 MR. PEARCE: Objection.</p> <p>15 A. I don't know. I'm not sitting</p> <p>16 on the school board yet.</p> <p>17 Q. When you were campaigning, did</p> <p>18 you ever say what you would do differently</p> <p>19 than the school board at that time?</p> <p>20 A. I didn't compare what I -- what</p> <p>21 my -- well, I didn't compare what I would</p> <p>22 like to do with what I felt the school board</p> <p>23 was doing. I didn't compare, no.</p> <p>24 MR. LEVINE: Why don't we a take</p> <p>25 a five-minute break.</p>
<p style="text-align: right;">Page 59</p> <p>1 Dos Reis</p> <p>2 Q. Were there any debates during</p> <p>3 the campaign?</p> <p>4 A. Debates were set up. Debates</p> <p>5 did not happen because our opponents never</p> <p>6 came. They were invited, but they never</p> <p>7 came.</p> <p>8 Q. Did you ever give any speeches</p> <p>9 where you set out your political views for</p> <p>10 your campaign?</p> <p>11 A. Yes.</p> <p>12 Q. Where did you give speeches?</p> <p>13 A. I gave my first speech -- well,</p> <p>14 when I announced my candidacy. Well, when I</p> <p>15 announced my candidacy, I gave information</p> <p>16 about myself and I answered questions from</p> <p>17 the public.</p> <p>18 Q. Do you know if any of that was</p> <p>19 ever written down or recorded?</p> <p>20 A. Officially, I don't know.</p> <p>21 Q. Anything else along those lines?</p> <p>22 A. We had a fund-raiser and at the</p> <p>23 fund-raiser I spoke.</p> <p>24 Q. What did you say?</p> <p>25 A. Just where my platform was,</p>	<p style="text-align: right;">Page 61</p> <p>1 Dos Reis</p> <p>2 (Recess taken.)</p> <p>3 MR. LEVINE: Could you read back</p> <p>4 the last question and answer so we can</p> <p>5 pick up where we left off.</p> <p>6 (Record read.)</p> <p>7 Q. If you could take a look at</p> <p>8 paragraph 21 of your declaration.</p> <p>9 A. Yes.</p> <p>10 Q. You say that you were not</p> <p>11 invited to any candidate forums in the</p> <p>12 predominantly White communities of the</p> <p>13 district including New Square, Kaser or</p> <p>14 Monsey. Do you know if there were any</p> <p>15 candidate forums in those neighborhoods?</p> <p>16 A. No, I don't know.</p> <p>17 Q. So you don't know if there were</p> <p>18 any candidate forums to which you could have</p> <p>19 been invited, right?</p> <p>20 A. Right.</p> <p>21 Q. How do you know that New Square,</p> <p>22 Kaser or Monsey are predominantly White</p> <p>23 communities?</p> <p>24 A. I mean, I don't really know how</p> <p>25 to state it, but I guess it's kind of</p>

<p style="text-align: right;">Page 62</p> <p>1 Dos Reis</p> <p>2 obvious when you drive through.</p> <p>3 Q. Have you driven through</p> <p>4 New Square?</p> <p>5 A. I drive -- I don't know if it's</p> <p>6 necessarily New Square. New Square is kind</p> <p>7 of cut off, but I drive on, it's called,</p> <p>8 Route 45, which New Square is right off of.</p> <p>9 I drive through there about five times a</p> <p>10 day.</p> <p>11 Q. And you know from driving past</p> <p>12 New Square that's it's a predominantly White</p> <p>13 community?</p> <p>14 A. Yeah. I've never seen anyone of</p> <p>15 color coming in and out of there.</p> <p>16 Q. How about Kaser, how do you know</p> <p>17 Kaser is a predominantly White community?</p> <p>18 A. Kaser is -- it's just about the</p> <p>19 same thing, just driving through the area</p> <p>20 and just never seen -- not often seeing a</p> <p>21 person of color coming in or out.</p> <p>22 Q. What do you see coming in or</p> <p>23 out?</p> <p>24 A. Mostly those from the Hasidic</p> <p>25 community, people from the Hasidic</p>	<p style="text-align: right;">Page 64</p> <p>1 Dos Reis</p> <p>2 Q. Do you get along with Haitian</p> <p>3 people?</p> <p>4 A. Yes.</p> <p>5 Q. Do you get along with</p> <p>6 African-American people?</p> <p>7 A. Yes.</p> <p>8 Q. Do you get along with Latino</p> <p>9 people?</p> <p>10 A. Yes.</p> <p>11 Q. Do you get along with Jewish</p> <p>12 people?</p> <p>13 A. Yes.</p> <p>14 Q. So you get along?</p> <p>15 A. For the most part, yes, of</p> <p>16 course.</p> <p>17 Q. All right, that's what I'm</p> <p>18 asking.</p> <p>19 Take a look at paragraph 23.</p> <p>20 You say, "I do not know which organizations</p> <p>21 or community leaders endorsed the slate on</p> <p>22 which my opponent Joe Freilich ran."</p> <p>23 So my question is: Do you know</p> <p>24 whether any organizations or community</p> <p>25 leaders endorsed your opponent's slate?</p>
<p style="text-align: right;">Page 63</p> <p>1 Dos Reis</p> <p>2 community.</p> <p>3 Q. Is that the same for Monsey as</p> <p>4 well?</p> <p>5 A. In Monsey there is -- Monsey is</p> <p>6 diverse, it's more diverse.</p> <p>7 Q. How do you know that?</p> <p>8 A. Well, because my son's school is</p> <p>9 in Monsey. I live five blocks from Monsey,</p> <p>10 so I'm constantly up in the Monsey area, and</p> <p>11 there you'll see -- as I drive my son to</p> <p>12 school, you'll see all the kids outside</p> <p>13 waiting for buses, and it's clearly diverse.</p> <p>14 Q. When you say "diverse," what are</p> <p>15 the communities in Monsey that make it</p> <p>16 diverse?</p> <p>17 A. Diverse, we have</p> <p>18 African American, Latino, Haitian, Jewish,</p> <p>19 White. That's diverse.</p> <p>20 Q. Does everybody get along?</p> <p>21 MR. PEARCE: Objection.</p> <p>22 A. I don't know.</p> <p>23 Q. I mean, just in your own</p> <p>24 experience?</p> <p>25 A. I don't know.</p>	<p style="text-align: right;">Page 65</p> <p>1 Dos Reis</p> <p>2 A. No.</p> <p>3 Q. So it's possible that no</p> <p>4 organizations or community leaders endorsed</p> <p>5 your opponent's slate; you just don't know?</p> <p>6 A. I don't know.</p> <p>7 Q. The next sentence you say that</p> <p>8 you "were never offered an opportunity to</p> <p>9 compete for a position on that slate or for</p> <p>10 the endorsement of the community leaders who</p> <p>11 endorsed my opponent."</p> <p>12 So the question then is: Do you</p> <p>13 know if there actually was any competition</p> <p>14 for your opponent's slate?</p> <p>15 A. You know what, that part is my</p> <p>16 fault. I didn't know exactly how to say it.</p> <p>17 It wasn't so much that I was competing for a</p> <p>18 position under slate. That was my fault.</p> <p>19 What I wanted to say was that I would have</p> <p>20 liked an opportunity to have been heard by</p> <p>21 those from the private community schools,</p> <p>22 such as when community leaders from the</p> <p>23 Martin Luther King Center and NAACP and</p> <p>24 Strong East Ramapo invited our opponents to</p> <p>25 forums and, you know, to debates, and they</p>

<p style="text-align: right;">Page 66</p> <p>1 Dos Reis</p> <p>2 didn't come, I just wished that we had had</p> <p>3 the opportunity to have been heard by both</p> <p>4 our opponents and parents from the private</p> <p>5 school community.</p> <p>6 Q. When you say in the last</p> <p>7 sentence here that you don't know what</p> <p>8 criteria those organizations or leaders used</p> <p>9 to slate or endorse their preferred</p> <p>10 candidates, you don't know whether there are</p> <p>11 any such organizations or leaders or</p> <p>12 criteria; is that right?</p> <p>13 A. Yes.</p> <p>14 Q. Maybe there are, maybe there</p> <p>15 aren't; you just don't know?</p> <p>16 A. Right, I don't know.</p> <p>17 Q. So when you say you were never</p> <p>18 offered an opportunity to compete for a</p> <p>19 position, what you mean is that you wanted</p> <p>20 an opportunity to be able to speak to people</p> <p>21 from this other community; is that fair?</p> <p>22 A. Yes.</p> <p>23 Q. Did you give any interviews with</p> <p>24 the newspaper when you were a candidate?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 68</p> <p>1 Dos Reis</p> <p>2 many people came?</p> <p>3 A. No.</p> <p>4 Q. More than 20 sound about right?</p> <p>5 A. Yes.</p> <p>6 Q. More than 30 sound about right?</p> <p>7 A. Yes.</p> <p>8 Q. More than 50 sound about right?</p> <p>9 A. I don't know.</p> <p>10 Q. Am I close?</p> <p>11 A. I really don't know.</p> <p>12 Q. Under a hundred?</p> <p>13 A. I don't know.</p> <p>14 Q. Does the NAACP Spring Valley</p> <p>15 have members?</p> <p>16 MR. PEARCE: Objection.</p> <p>17 A. Does the NAACP have members?</p> <p>18 Q. Um-hum.</p> <p>19 A. Yes.</p> <p>20 Q. How do you know that?</p> <p>21 A. Well, I've attended events of</p> <p>22 theirs and they usually pass around</p> <p>23 applications for membership, so...</p> <p>24 Q. Are you a member of the NAACP?</p> <p>25 A. I am. I am. I just haven't</p>
<p style="text-align: right;">Page 67</p> <p>1 Dos Reis</p> <p>2 Q. Did you state your positions in</p> <p>3 those news articles?</p> <p>4 A. In the sense of what our</p> <p>5 platform was, yes, when our position was</p> <p>6 about transparency, diversity and inclusion.</p> <p>7 Q. So in the next paragraph,</p> <p>8 paragraph 24, you say that you never saw</p> <p>9 your opponent or other members of the slate</p> <p>10 campaigning and that they did not attend any</p> <p>11 candidate forums that you attended; for</p> <p>12 example, the opponent did not attend the</p> <p>13 forum held by the NAACP and JAMCCAR.</p> <p>14 When you say "the NAACP," do you</p> <p>15 mean the NAACP of Spring Valley?</p> <p>16 A. Yes.</p> <p>17 Q. When was the NAACP of Spring</p> <p>18 Valley forum?</p> <p>19 A. It would have been in either</p> <p>20 March or April of 2017.</p> <p>21 Q. How many people came to the</p> <p>22 NAACP forum?</p> <p>23 MR. PEARCE: Objection.</p> <p>24 A. I don't know exactly.</p> <p>25 Q. Could you estimate about how</p>	<p style="text-align: right;">Page 69</p> <p>1 Dos Reis</p> <p>2 officially paid any dues yet.</p> <p>3 Q. Do you know about how many</p> <p>4 people are members of the NAACP?</p> <p>5 A. No, I don't.</p> <p>6 Q. In paragraph 10 of your</p> <p>7 declaration, on the very bottom you say,</p> <p>8 "With the exception of Mr. Germain on one</p> <p>9 occasion in 2016 and Ms. Charles-Pierre, I</p> <p>10 am not aware of any current member of the</p> <p>11 board participating in any of these</p> <p>12 candidate forums or any other candidate</p> <p>13 forum in my community."</p> <p>14 Who are you referring to when</p> <p>15 you refer to Mr. Germain?</p> <p>16 A. I'm sorry?</p> <p>17 Q. Who is Mr. Germain?</p> <p>18 A. Mr. Germain is one of the school</p> <p>19 board candidates -- I mean, not candidate.</p> <p>20 He's one of the school board members.</p> <p>21 Q. Are you referring to Pierre</p> <p>22 Germain?</p> <p>23 A. Yes.</p> <p>24 Q. And you're aware that he</p> <p>25 attended a forum in your community in 2016?</p>

<p style="text-align: right;">Page 70</p> <p>1 Dos Reis</p> <p>2 A. Yes.</p> <p>3 Q. What forum was that?</p> <p>4 A. It was a forum being hosted by</p> <p>5 the NAACP and JAMCCAR.</p> <p>6 Q. Just for the record, is JAMCCAR</p> <p>7 the Jamaican Civic and Cultural Association</p> <p>8 of Rockland?</p> <p>9 A. Yes.</p> <p>10 Q. Did you attend that forum?</p> <p>11 A. Yes.</p> <p>12 Q. Did you speak with Mr. Germain?</p> <p>13 A. We greeted each other.</p> <p>14 Q. Did Mr. Germain speak at the</p> <p>15 forum?</p> <p>16 A. I don't know. I got there late.</p> <p>17 Q. Does it matter to you that</p> <p>18 Mr. Germain attended that forum for some</p> <p>19 reason?</p> <p>20 A. No.</p> <p>21 Q. Did you vote for Mr. Germain</p> <p>22 when he ran?</p> <p>23 A. When he ran for reelection, no.</p> <p>24 Q. Did you vote for Mr. Germain</p> <p>25 when he ran in 2013?</p>	<p style="text-align: right;">Page 72</p> <p>1 Dos Reis</p> <p>2 A. I don't remember.</p> <p>3 Q. Do you recall any specific</p> <p>4 reasons why -- just to use your own words,</p> <p>5 do you recall any specific reasons why the</p> <p>6 public school community became disappointed</p> <p>7 with Mr. Germain?</p> <p>8 A. So many things happened in the</p> <p>9 district. I don't remember the details of</p> <p>10 like exactly what it was that he voted on</p> <p>11 that disappointed a lot of us from the</p> <p>12 public school community. I don't remember</p> <p>13 specifically.</p> <p>14 Q. Can you explain any reason why</p> <p>15 the public school community became</p> <p>16 disappointed in Mr. Germain?</p> <p>17 MR. PEARCE: Objection.</p> <p>18 A. Specifically, no.</p> <p>19 Q. How about generally, can you</p> <p>20 explain any reason why the public school</p> <p>21 community became disappointed in Mr. Germain</p> <p>22 generally?</p> <p>23 A. No, not -- no.</p> <p>24 Q. In your understanding, was the</p> <p>25 public school community disappointed in</p>
<p style="text-align: right;">Page 71</p> <p>1 Dos Reis</p> <p>2 A. I don't recall.</p> <p>3 Q. Did you vote in 2013?</p> <p>4 A. I don't think so.</p> <p>5 Q. Why didn't you vote for</p> <p>6 Mr. Germain in his reelection bid?</p> <p>7 A. I didn't vote for him in his</p> <p>8 reelection -- I don't believe I did because</p> <p>9 by then a lot of people from the public</p> <p>10 school community were disappointed, felt</p> <p>11 disappointed, and let down by him.</p> <p>12 Q. Why?</p> <p>13 A. When it came to decisions that</p> <p>14 needed to be made, oftentimes Mr. Germain</p> <p>15 was either not at the board meeting or did</p> <p>16 not vote in favor of what the public school</p> <p>17 parents wanted.</p> <p>18 Q. Do you recall any specific votes</p> <p>19 that Mr. Germain cast that you disagreed</p> <p>20 with?</p> <p>21 A. No, I don't remember.</p> <p>22 Q. Do you recall any specific</p> <p>23 issues that the public school parents wanted</p> <p>24 to go one way and Mr. Germain went the</p> <p>25 other?</p>	<p style="text-align: right;">Page 73</p> <p>1 Dos Reis</p> <p>2 Mr. Germain because he voted with the</p> <p>3 Orthodox and Hasidic Jewish members of the</p> <p>4 board of education?</p> <p>5 A. I don't know if it was</p> <p>6 necessarily with the other board members.</p> <p>7 Q. As you sit here today, you don't</p> <p>8 know why you didn't vote for Mr. Germain?</p> <p>9 MR. PEARCE: Objection.</p> <p>10 A. I do. I just don't remember</p> <p>11 specifically what we disagreed on.</p> <p>12 Q. Do you know who Bernard Charles</p> <p>13 is?</p> <p>14 A. Yes.</p> <p>15 Q. Did you ever vote for Bernard</p> <p>16 Charles?</p> <p>17 A. I did not vote for him in his</p> <p>18 reelection.</p> <p>19 Q. Did you vote for him the first</p> <p>20 time that he ran?</p> <p>21 A. I don't recall.</p> <p>22 Q. Why didn't you vote for</p> <p>23 Mr. Charles in his reelection bid?</p> <p>24 A. For the same reason as</p> <p>25 Mr. Germain.</p>

<p style="text-align: right;">Page 74</p> <p>1 Dos Reis</p> <p>2 Q. Is that because the public</p> <p>3 school community became disappointed in</p> <p>4 Mr. Charles; is that right?</p> <p>5 A. Yes, yes.</p> <p>6 Q. Do you recall any specific</p> <p>7 reasons why the public school community</p> <p>8 became disappointed in Mr. Charles?</p> <p>9 A. No, nothing specific.</p> <p>10 Q. How about you specifically, are</p> <p>11 you disappointed in Mr. Charles?</p> <p>12 A. Yes.</p> <p>13 Q. Why are you disappointed with</p> <p>14 Mr. Charles?</p> <p>15 A. Well, Mr. Charles attends even</p> <p>16 less school board meetings than Mr. Germain.</p> <p>17 Mr. Charles is almost never at the board</p> <p>18 meetings.</p> <p>19 Q. How do you know that?</p> <p>20 A. Because I attend -- well, in the</p> <p>21 last year I attended the school board</p> <p>22 meetings regularly.</p> <p>23 Q. In the last year in which you</p> <p>24 attended the board meetings regularly,</p> <p>25 Mr. Charles has not attended school board</p>	<p style="text-align: right;">Page 76</p> <p>1 Dos Reis</p> <p>2 Valley?</p> <p>3 A. Yes, I do see him in Spring</p> <p>4 Valley.</p> <p>5 Q. Because he lives in Spring</p> <p>6 Valley, right?</p> <p>7 A. Yes.</p> <p>8 Q. Do you know him?</p> <p>9 A. Yes and no.</p> <p>10 Q. Have you ever spoken with him?</p> <p>11 A. Yeah, briefly, yes.</p> <p>12 Q. When was that?</p> <p>13 A. Whenever we see each other in</p> <p>14 Spring Valley, it's always hello and</p> <p>15 good-bye because it's just a familiar face.</p> <p>16 Q. Did you ever talk with him about</p> <p>17 the school district?</p> <p>18 A. I never got to speak to him</p> <p>19 about the school district, but he did</p> <p>20 approach me about -- he approached me when</p> <p>21 he learned that I was running for school</p> <p>22 board.</p> <p>23 Q. When was that?</p> <p>24 A. It would have been in March or</p> <p>25 April again.</p>
<p style="text-align: right;">Page 75</p> <p>1 Dos Reis</p> <p>2 meetings; is that right?</p> <p>3 A. He has not attended many.</p> <p>4 Q. About how many?</p> <p>5 A. Very few. I couldn't tell you</p> <p>6 exactly how many.</p> <p>7 Q. So about how many do you recall</p> <p>8 that he attended?</p> <p>9 A. I don't know the exact figure,</p> <p>10 but more often than not he was not there.</p> <p>11 Q. Is there any other reason why</p> <p>12 you're disappointed in Mr. Charles?</p> <p>13 A. When he campaigned, I didn't --</p> <p>14 I do not recall seeing him when he was</p> <p>15 campaigning, and so that was disappointing,</p> <p>16 you know, to not see him out and about</p> <p>17 campaigning.</p> <p>18 Q. You live in Spring Valley,</p> <p>19 right?</p> <p>20 A. Yes.</p> <p>21 Q. So you're saying you didn't see</p> <p>22 Mr. Charles in Spring Valley?</p> <p>23 A. Campaigning, I didn't see him</p> <p>24 campaigning.</p> <p>25 Q. Did you see him in Spring</p>	<p style="text-align: right;">Page 77</p> <p>1 Dos Reis</p> <p>2 Q. When you say he approached you,</p> <p>3 was that in person?</p> <p>4 A. Yes.</p> <p>5 Q. Was it at a school board</p> <p>6 meeting?</p> <p>7 A. Yes.</p> <p>8 Q. What did he say to you?</p> <p>9 A. He wanted to know why I didn't</p> <p>10 tell him that I was running.</p> <p>11 Q. What did you say?</p> <p>12 A. I told him that I didn't think I</p> <p>13 had to tell anyone specifically. I just --</p> <p>14 I went to a forum and I announced my</p> <p>15 candidacy at a forum where it was called for</p> <p>16 and I didn't think I had to reach out to</p> <p>17 people specifically and let them know I was</p> <p>18 running.</p> <p>19 Q. Why do you think he asked you</p> <p>20 that?</p> <p>21 MR. PEARCE: Objection.</p> <p>22 MR. LEVINE: Okay, that's fine.</p> <p>23 I'll ask it a different way.</p> <p>24 Q. Was Mr. Charles interested in</p> <p>25 supporting your campaign?</p>

<p style="text-align: right;">Page 78</p> <p>1 Dos Reis</p> <p>2 A. I think so.</p> <p>3 Q. Did you talk with him further</p> <p>4 about that?</p> <p>5 A. No.</p> <p>6 Q. Why not?</p> <p>7 A. He was upset that I didn't tell</p> <p>8 him that I was running, and so we just left</p> <p>9 it at -- when I told him that I didn't think</p> <p>10 I had to specifically reach out to anyone,</p> <p>11 we left it at that.</p> <p>12 Q. Did Mr. Charles want to help</p> <p>13 you?</p> <p>14 A. I don't know.</p> <p>15 Q. Did you ever talk with him again</p> <p>16 after that?</p> <p>17 A. No.</p> <p>18 Q. How long have you known him?</p> <p>19 A. It's been a couple of years now.</p> <p>20 Q. At any point in those few years</p> <p>21 have you ever talked with him about school</p> <p>22 district politics?</p> <p>23 A. No.</p> <p>24 Q. Do you think you could if you</p> <p>25 wanted to?</p>	<p style="text-align: right;">Page 80</p> <p>1 Dos Reis</p> <p>2 Q. Could you tell him that?</p> <p>3 MR. PEARCE: Objection.</p> <p>4 A. I could.</p> <p>5 Q. What about Pierre Germain, did</p> <p>6 you ever try to tell him that you were</p> <p>7 disappointed in him?</p> <p>8 A. I did.</p> <p>9 Q. When was that?</p> <p>10 A. He approached me the same night</p> <p>11 before Mr. Charles.</p> <p>12 Q. At the same board meeting?</p> <p>13 A. Yes.</p> <p>14 Q. What did he say to you?</p> <p>15 A. He was upset that I didn't tell</p> <p>16 him I was running, but not as upset as</p> <p>17 Mr. Charles. Mr. Charles was very upset.</p> <p>18 Mr. Germain approached me about it, he was a</p> <p>19 little upset, but then we talked it out.</p> <p>20 Q. What did you talk about?</p> <p>21 A. Well, he asked me why I didn't</p> <p>22 tell him that I was running. And I said to</p> <p>23 him the same thing, I didn't think I had to</p> <p>24 let anyone specifically know. And he said</p> <p>25 that he would have helped me. And I said to</p>
<p style="text-align: right;">Page 79</p> <p>1 Dos Reis</p> <p>2 A. Yes.</p> <p>3 Q. Have you ever expressed to him</p> <p>4 that you were disappointed in him as a</p> <p>5 school board member?</p> <p>6 A. I didn't express it to him</p> <p>7 through words that I was disappointed.</p> <p>8 Q. How did you express it to him?</p> <p>9 A. I think that that was the</p> <p>10 unsaid -- the unspoken truth between us when</p> <p>11 he asked me why I didn't tell him I was</p> <p>12 running.</p> <p>13 Q. What do you mean by that?</p> <p>14 A. Well, I didn't tell him that I</p> <p>15 was running, I didn't reach out to him,</p> <p>16 although every time we see each other, we'd</p> <p>17 greet each other. I didn't tell him I was</p> <p>18 running because I was disappointed in him</p> <p>19 because I never see him at school board</p> <p>20 meetings, and to me it's a let down. If</p> <p>21 you're a somebody member, you should be at</p> <p>22 the meeting.</p> <p>23 Q. Why didn't you tell him that?</p> <p>24 MR. PEARCE: Objection.</p> <p>25 A. I don't know.</p>	<p style="text-align: right;">Page 81</p> <p>1 Dos Reis</p> <p>2 him that I didn't want to -- you know, I</p> <p>3 just wanted to -- I wanted to kind of</p> <p>4 just -- I put it out there that I was</p> <p>5 running and I didn't think to go to anyone</p> <p>6 specific.</p> <p>7 Q. Did you tell Mr. Germain that</p> <p>8 you didn't want his help?</p> <p>9 A. No, just that I wasn't looking</p> <p>10 for help from specific people. I just</p> <p>11 wanted to put myself out there. And my</p> <p>12 thing is I'm not a politician. I'm not --</p> <p>13 you know, I don't have any motivations for</p> <p>14 running for school board aside from wanting</p> <p>15 to bring positive change to the board, so</p> <p>16 there was no need for me to look</p> <p>17 specifically to people.</p> <p>18 Q. What do you mean by that?</p> <p>19 A. Well, when he said to me, why</p> <p>20 didn't you come to me, I said, well, I</p> <p>21 didn't think I had to. I mean, if --</p> <p>22 obviously if they wanted to support me once</p> <p>23 they learned I was running, then they could</p> <p>24 just support me by voting or telling other</p> <p>25 people, you know, that I was running.</p>

<p style="text-align: right;">Page 82</p> <p>1 Dos Reis</p> <p>2 That's it.</p> <p>3 Q. Pierre Germain has run two</p> <p>4 successful campaigns for the school board,</p> <p>5 right?</p> <p>6 A. Yes.</p> <p>7 Q. And he offered to help you in</p> <p>8 your campaign, right?</p> <p>9 A. Right, afterwards, uh-huh.</p> <p>10 Q. Don't you think that would be</p> <p>11 useful in running a successful campaign for</p> <p>12 the school board?</p> <p>13 A. Yes, like -- in the way that</p> <p>14 you're saying it, yes.</p> <p>15 Q. Mr. Charles has also run two</p> <p>16 successful campaigns for the school board,</p> <p>17 right?</p> <p>18 A. Yes.</p> <p>19 Q. And you think he wanted to help</p> <p>20 you, right?</p> <p>21 A. Perhaps.</p> <p>22 Q. Don't you think that would have</p> <p>23 been helpful also?</p> <p>24 A. Yes.</p> <p>25 Q. Why didn't you want their help?</p>	<p style="text-align: right;">Page 84</p> <p>1 Dos Reis</p> <p>2 not his concern, some of the issues that we</p> <p>3 have.</p> <p>4 Q. What did you tell him about what</p> <p>5 people are saying about him in the</p> <p>6 community?</p> <p>7 A. I told him that the people were</p> <p>8 disappointed in him.</p> <p>9 Q. Is that it?</p> <p>10 A. Yeah, that they were</p> <p>11 disappointed that he wasn't often at the</p> <p>12 meetings and that he never said anything at</p> <p>13 the meetings.</p> <p>14 Q. Did people say anything else</p> <p>15 about Pierre Germain in the community?</p> <p>16 MR. PEARCE: Objection.</p> <p>17 A. No.</p> <p>18 Q. Why was Mr. Charles upset that</p> <p>19 you didn't reach out to him?</p> <p>20 MR. PEARCE: Objection.</p> <p>21 A. I don't know.</p> <p>22 Q. How upset was he?</p> <p>23 A. Well, he came over to me and he</p> <p>24 was upset and said to me that -- he</p> <p>25 expressed that he was upset, and then the</p>
<p style="text-align: right;">Page 83</p> <p>1 Dos Reis</p> <p>2 A. It's not that I didn't want</p> <p>3 their help. If they wanted to help me, then</p> <p>4 they could, but I didn't feel the need to</p> <p>5 reach out specifically to anyone.</p> <p>6 Q. But when they approached you at</p> <p>7 the school board meeting, did you reject</p> <p>8 their offers of help?</p> <p>9 A. Well, Mr. Charles just expressed</p> <p>10 that he was upset that I didn't tell him.</p> <p>11 We didn't really discuss anything further.</p> <p>12 And Mr. Pierre I said to him, if you want to</p> <p>13 help me, by all means, spread the word, let</p> <p>14 people know, and we left it at that.</p> <p>15 Q. During that conversation you</p> <p>16 told Mr. Germain you were disappointed in</p> <p>17 his record as a school board member?</p> <p>18 A. I asked him -- I told him what</p> <p>19 the people were saying about him in the</p> <p>20 community, and I asked him why he wasn't at</p> <p>21 board meetings more often, and for him he</p> <p>22 said that it wasn't his job to make change,</p> <p>23 that that was on the superintendent. The</p> <p>24 school board is just there to make sure that</p> <p>25 the superintendent does their job, that it's</p>	<p style="text-align: right;">Page 85</p> <p>1 Dos Reis</p> <p>2 conversation ended abruptly.</p> <p>3 Q. How so?</p> <p>4 A. In the sense that when I told</p> <p>5 him I didn't think I had to reach out to</p> <p>6 anyone specifically, he said, okay, and then</p> <p>7 walked away.</p> <p>8 Q. I mean, was that like a</p> <p>9 conflict?</p> <p>10 A. What do you mean?</p> <p>11 Q. Like was it an uncomfortable</p> <p>12 conversation?</p> <p>13 A. No, I wasn't uncomfortable.</p> <p>14 Q. What about your conversation</p> <p>15 with Mr. Pierre?</p> <p>16 A. No.</p> <p>17 Q. Because you used the phrase</p> <p>18 before that you talked it out. What did you</p> <p>19 mean by that?</p> <p>20 A. Yeah. Well, our conversation</p> <p>21 didn't end abruptly when I told him that I</p> <p>22 didn't think I needed to reach out to anyone</p> <p>23 specifically. I told him how the community</p> <p>24 was feeling about him. I expressed to him</p> <p>25 that I was also disappointed that I didn't</p>

<p style="text-align: right;">Page 86</p> <p>1 Dos Reis</p> <p>2 see him at meetings often, that he never</p> <p>3 spoke out at the meetings. And he said what</p> <p>4 he said about how it's not his job, and then</p> <p>5 we left it at that.</p> <p>6 Q. Is that a disagreement between</p> <p>7 you and Mr. Germain?</p> <p>8 A. Well, there is a difference of</p> <p>9 opinion, but not a disagreement.</p> <p>10 Q. Have you spoken with either of</p> <p>11 them since that board meeting?</p> <p>12 A. Yes. We all live in Spring</p> <p>13 Valley, so we always say hello to each</p> <p>14 other.</p> <p>15 Q. Have you ever spoken with</p> <p>16 Mr. Charles about the school district</p> <p>17 specifically since then?</p> <p>18 A. No.</p> <p>19 Q. Have you ever spoken with</p> <p>20 Mr. Germain about the school district since</p> <p>21 then?</p> <p>22 A. No.</p> <p>23 Q. You haven't talked with either</p> <p>24 of them about running for any other</p> <p>25 political office?</p>	<p style="text-align: right;">Page 88</p> <p>1 Dos Reis</p> <p>2 A. Right. No, we were not.</p> <p>3 Q. Do you know why that is?</p> <p>4 MR. PEARCE: Objection.</p> <p>5 A. I don't know.</p> <p>6 Q. Do you think -- how do I want to</p> <p>7 say this?</p> <p>8 Would you characterize East</p> <p>9 Ramapo's electorate as being divided between</p> <p>10 White private school community and the</p> <p>11 public school community?</p> <p>12 A. Yes.</p> <p>13 Q. Do you know whether the White</p> <p>14 private school community supported</p> <p>15 Mr. Charles' bid for the school board?</p> <p>16 A. With him, I don't know.</p> <p>17 Q. Do you know whether the private</p> <p>18 school community supported Mr. Germain's bid</p> <p>19 for the school board?</p> <p>20 A. Yes.</p> <p>21 Q. Do you think that they might</p> <p>22 have been able to help you campaign in that</p> <p>23 community if you had asked them?</p> <p>24 A. Yes.</p> <p>25 Q. Do you think that you had to</p>
<p style="text-align: right;">Page 87</p> <p>1 Dos Reis</p> <p>2 A. No.</p> <p>3 Q. When you decided to run for</p> <p>4 school board, did you reach out to anyone to</p> <p>5 ask for help?</p> <p>6 A. No.</p> <p>7 Q. How did you obtain support from</p> <p>8 Steve White?</p> <p>9 A. Well, he's the gentleman who</p> <p>10 sent out the call for candidates through</p> <p>11 Power of Ten.</p> <p>12 And so the process is you go --</p> <p>13 right, Power of Ten puts out and other</p> <p>14 community leaders put information out to the</p> <p>15 public that they're holding a candidates</p> <p>16 forum. Those of us who are interested in</p> <p>17 running present ourselves. And then some of</p> <p>18 the community leaders come to together and</p> <p>19 they take the votes from the people from</p> <p>20 that night, plus an interview that they do</p> <p>21 with us, and then they decide what</p> <p>22 candidates they're going to support, and</p> <p>23 that's how the process works.</p> <p>24 Q. You weren't successful in your</p> <p>25 race for the school board, right?</p>	<p style="text-align: right;">Page 89</p> <p>1 Dos Reis</p> <p>2 choose between Power of Ten on the one hand</p> <p>3 and Mr. Charles and Mr. Germain on the</p> <p>4 other?</p> <p>5 A. No.</p> <p>6 Q. So you could have gone to both?</p> <p>7 A. Yes.</p> <p>8 Q. Why didn't you?</p> <p>9 A. Well, I didn't go to Power of</p> <p>10 Ten. Like I said, Power of Ten puts out a</p> <p>11 call for candidates, so it was an</p> <p>12 opportunity for me to become a candidate,</p> <p>13 and so that's why I ended up with the</p> <p>14 support of Power of Ten and Strong East</p> <p>15 Ramapo because they called for candidates.</p> <p>16 Q. You could become a candidate</p> <p>17 without Power of Ten, couldn't you?</p> <p>18 A. Yes, but I didn't think of being</p> <p>19 a candidate until I saw their call for</p> <p>20 candidates.</p> <p>21 Q. Did anything stop you from</p> <p>22 asking Mr. Germain or Mr. Charles for help</p> <p>23 once you became a candidate?</p> <p>24 A. No.</p> <p>25 Q. Do you know whether Power of Ten</p>

<p style="text-align: right;">Page 90</p> <p>1 Dos Reis</p> <p>2 is popular in the private school community?</p> <p>3 A. I don't know.</p> <p>4 Q. Do you know whether any</p> <p>5 candidate supported by Power of Ten has ever</p> <p>6 won a majority of votes from the private</p> <p>7 school community?</p> <p>8 A. I don't know. I don't know.</p> <p>9 Q. For your campaign, along with</p> <p>10 your slate, did you have a vote turnout</p> <p>11 program?</p> <p>12 A. What do you --</p> <p>13 Q. By that I mean, did you have any</p> <p>14 organized effort to get people to the polls</p> <p>15 on election day?</p> <p>16 A. Did we have an organized, setup</p> <p>17 for getting people out to the polls?</p> <p>18 Q. Um-hum.</p> <p>19 A. Yes.</p> <p>20 Q. Okay. If I call that a</p> <p>21 "get-out-the-vote effort," would you know</p> <p>22 what I mean?</p> <p>23 A. Yes, that's exactly what it was.</p> <p>24 Q. All right. What did you do?</p> <p>25 A. We knocked on doors, we made</p>	<p style="text-align: right;">Page 92</p> <p>1 Dos Reis</p> <p>2 door knocking and the phone calls was to</p> <p>3 remind them that election day was happening.</p> <p>4 That's what we wanted people to remember,</p> <p>5 that there was an election happening on that</p> <p>6 day. We did so by phone calls, door</p> <p>7 knocking, like I said, flyers and offering</p> <p>8 to take people to their polling sites.</p> <p>9 Q. Do you know how many people you</p> <p>10 reached with those efforts?</p> <p>11 A. I don't know.</p> <p>12 Q. Would you care to estimate?</p> <p>13 A. No.</p> <p>14 Q. Do you know whether Mr. Charles</p> <p>15 has experience organizing get-out-the-vote</p> <p>16 efforts?</p> <p>17 A. I don't know.</p> <p>18 Q. Do you know whether Mr. Germain</p> <p>19 has experience with get-out-the-vote</p> <p>20 efforts?</p> <p>21 A. I don't know.</p> <p>22 Q. Do you recall about how many</p> <p>23 people showed up to the polls to vote for</p> <p>24 your opponent on election day in 2017?</p> <p>25 A. No. You mean how many people</p>
<p style="text-align: right;">Page 91</p> <p>1 Dos Reis</p> <p>2 phone calls, we left flyers on windshields.</p> <p>3 Q. What I mean specifically is like</p> <p>4 on election day, did you have a program</p> <p>5 where you offered people free rides to the</p> <p>6 polls to vote?</p> <p>7 A. Yes.</p> <p>8 Q. Tell me about that; what was</p> <p>9 that program?</p> <p>10 A. Exactly what you said, that's</p> <p>11 just offering free rides to the polls.</p> <p>12 Q. Do you know how many people used</p> <p>13 that service?</p> <p>14 A. Yes.</p> <p>15 Q. How many people?</p> <p>16 A. Well, I don't have an exact</p> <p>17 number, but roughly ten people had called</p> <p>18 for the service and either utilized it or in</p> <p>19 waiting ended up going a different route.</p> <p>20 Q. Ten people?</p> <p>21 A. Yeah.</p> <p>22 Q. Any other efforts to get people</p> <p>23 to the polls on election day?</p> <p>24 A. That was our -- well, like I</p> <p>25 said, and we used the other efforts as well,</p>	<p style="text-align: right;">Page 93</p> <p>1 Dos Reis</p> <p>2 showed up to the polling sites?</p> <p>3 Q. To vote for your opponent.</p> <p>4 A. Only through the figures.</p> <p>5 Q. Do you remember those?</p> <p>6 A. I believe they had 9,000 votes.</p> <p>7 Q. How many votes were cast for</p> <p>8 your side of the slate?</p> <p>9 A. Roughly about 4,800.</p> <p>10 Q. Do you think in retrospect it</p> <p>11 might have been helpful to have had some</p> <p>12 help campaigning in the private school</p> <p>13 community?</p> <p>14 A. As I said earlier, we would have</p> <p>15 liked to, and we kind of did through</p> <p>16 Ms. Kressel and Ms. Shani, but people will</p> <p>17 only vote for who they want to vote for.</p> <p>18 Q. Do you know whether Ms. Kressel</p> <p>19 or Ms. Shani have any experience in</p> <p>20 politics?</p> <p>21 A. Prior to me having met them, I</p> <p>22 don't know.</p> <p>23 Q. Do you know whether they have</p> <p>24 any experience in managing a</p> <p>25 get-out-the-vote effort?</p>

<p style="text-align: right;">Page 94</p> <p>1 Dos Reis</p> <p>2 A. I don't know.</p> <p>3 Q. Do you have any prior experience</p> <p>4 in politics?</p> <p>5 A. With politics, no.</p> <p>6 Q. Do you think experience in</p> <p>7 politics is important to run an effective</p> <p>8 campaign?</p> <p>9 A. Absolutely. It's part of it,</p> <p>10 yes. It's part of it, a big part.</p> <p>11 Q. Do you think your slate ran an</p> <p>12 effective campaign?</p> <p>13 A. Umm, I say we were effective in</p> <p>14 the sense that we were able to raise the</p> <p>15 number of votes in three particular polling</p> <p>16 sites, which was something that -- you know,</p> <p>17 that no one could have guessed, but we were</p> <p>18 able to raise the amount of people who came</p> <p>19 out and voted in three polling sites. So in</p> <p>20 that sense, yes, we were effective.</p> <p>21 Q. Mr. Charles is a Black man,</p> <p>22 right?</p> <p>23 A. Yes.</p> <p>24 Q. When he was elected to the</p> <p>25 board, he was elected with support from the</p>	<p style="text-align: right;">Page 96</p> <p>1 Dos Reis</p> <p>2 community prefers voting for White</p> <p>3 candidates?</p> <p>4 MR. PEARCE: Objection.</p> <p>5 A. I don't know.</p> <p>6 Q. Do you know what this case is</p> <p>7 about?</p> <p>8 A. Yes.</p> <p>9 Q. What is this case about?</p> <p>10 A. This case is about people of</p> <p>11 color in East Ramapo feeling</p> <p>12 underrepresented within the East Ramapo</p> <p>13 school district in the sense of when it</p> <p>14 comes to voting.</p> <p>15 Q. Were you hindered in any way</p> <p>16 from becoming a candidate for the board of</p> <p>17 education?</p> <p>18 A. No.</p> <p>19 Q. Were people of color unable to</p> <p>20 get to the polls on election day?</p> <p>21 MR. PEARCE: Objection.</p> <p>22 A. I can't speak for everyone.</p> <p>23 Q. Are you aware of any people of</p> <p>24 color who were somehow stopped from getting</p> <p>25 to the polls on election day?</p>
<p style="text-align: right;">Page 95</p> <p>1 Dos Reis</p> <p>2 private school community, right?</p> <p>3 A. From what I understand.</p> <p>4 Q. Mr. Germain is a Black man too,</p> <p>5 right?</p> <p>6 A. Um-hum, yes.</p> <p>7 Q. When he was elected, he was</p> <p>8 elected with support from the private school</p> <p>9 community, wasn't he?</p> <p>10 A. That's what he told me.</p> <p>11 Q. Do you recognize the name</p> <p>12 MaraLuz Corado?</p> <p>13 A. No.</p> <p>14 Q. Do you recall a Latino woman</p> <p>15 ever being elected to the school board?</p> <p>16 A. A Latina woman?</p> <p>17 Q. Um-hum.</p> <p>18 A. No, not that I recall.</p> <p>19 Q. Do you think that you lost the</p> <p>20 election in 2017 because of your race?</p> <p>21 A. Not because of my race, no.</p> <p>22 Q. Why do you think you lost?</p> <p>23 MR. PEARCE: Objection.</p> <p>24 A. I don't know.</p> <p>25 Q. Do you think that private school</p>	<p style="text-align: right;">Page 97</p> <p>1 Dos Reis</p> <p>2 A. I don't know.</p> <p>3 Q. Without telling me anything</p> <p>4 about anything you've ever spoken with your</p> <p>5 counsel about, I'm not interested in that,</p> <p>6 but when did you first agree to become a</p> <p>7 plaintiff in this case?</p> <p>8 A. It was about six months ago.</p> <p>9 Q. Why did you agree to become a</p> <p>10 plaintiff in this case?</p> <p>11 A. Because I wanted to see a change</p> <p>12 in our district for the better for everyone.</p> <p>13 Q. What change?</p> <p>14 A. In the last -- for some time</p> <p>15 now, I can't say the exact number of years,</p> <p>16 but for some time now public school parents</p> <p>17 have not been able to successfully elect any</p> <p>18 of their preferred candidates to the school</p> <p>19 board, and it's frustrating because we don't</p> <p>20 feel represented by the school board, by the</p> <p>21 current school board, with the exception of</p> <p>22 one person on the school board.</p> <p>23 Q. Is Mr. Charles not a public</p> <p>24 school parent?</p> <p>25 A. He doesn't have children in the</p>

<p style="text-align: right;">Page 98</p> <p>1 Dos Reis</p> <p>2 district, no.</p> <p>3 Q. How do you know that?</p> <p>4 A. I guess I just know.</p> <p>5 Q. Did you ever ask him?</p> <p>6 A. No.</p> <p>7 Q. Do you know where his kids went</p> <p>8 to school?</p> <p>9 A. I don't know where his kids went</p> <p>10 to school.</p> <p>11 Q. Would it surprise you to know</p> <p>12 that they went to public school?</p> <p>13 A. No.</p> <p>14 Q. Would that change your opinion</p> <p>15 about whether he's a public school parent?</p> <p>16 A. I mean, he could be a public</p> <p>17 school parent, but that doesn't mean he has</p> <p>18 their interests -- that he, you know, has</p> <p>19 their interests at heart.</p> <p>20 Q. Do you think Mr. Charles does</p> <p>21 not have the public school parents'</p> <p>22 interests at heart?</p> <p>23 A. To be honest, I don't know if he</p> <p>24 does.</p> <p>25 Q. Why not?</p>	<p style="text-align: right;">Page 100</p> <p>1 Dos Reis</p> <p>2 doing.</p> <p>3 Q. Do you think public school</p> <p>4 parents are entitled to win elections?</p> <p>5 A. No, I wouldn't say they were</p> <p>6 entitled, no. No one is entitled.</p> <p>7 Q. Well, a candidate who wins the</p> <p>8 most votes is entitled to win the election,</p> <p>9 right?</p> <p>10 A. Yes.</p> <p>11 Q. And the candidate who doesn't</p> <p>12 win the most votes usually is not entitled</p> <p>13 to win the election, right?</p> <p>14 A. Yes.</p> <p>15 Q. Do you think that your election</p> <p>16 was unfair?</p> <p>17 A. Yes.</p> <p>18 Q. Why was it unfair?</p> <p>19 A. In our district we have both</p> <p>20 public school students and parents and we</p> <p>21 have private school students and parents,</p> <p>22 and I feel, and many of us feel, that the</p> <p>23 school board should be a reflection of the</p> <p>24 community, and currently there are more</p> <p>25 members of the board who are from the</p>
<p style="text-align: right;">Page 99</p> <p>1 Dos Reis</p> <p>2 A. I guess part of the reason is,</p> <p>3 as you asked me, you know, why we never had</p> <p>4 conversations about the school board, you</p> <p>5 know, I'm a parent who's voiced concerns</p> <p>6 with the school board, and then I've seen</p> <p>7 him out and about in Spring Valley and he's</p> <p>8 never even approached me to say, you know,</p> <p>9 this is what the school board is trying to</p> <p>10 do, why -- I heard your concerns the other</p> <p>11 night and this what the school board is</p> <p>12 trying to do. Like he himself as a school</p> <p>13 board member has never reached out to me or</p> <p>14 anyone else that I know to say, listen, I've</p> <p>15 heard your concerns and this is what the</p> <p>16 school board is trying to do. I think that</p> <p>17 that's something that a school board member</p> <p>18 should do.</p> <p>19 Q. Have you ever told him that?</p> <p>20 A. No.</p> <p>21 Q. Do you think maybe you should?</p> <p>22 A. I don't think I should have to.</p> <p>23 When you -- you know, when you take on that</p> <p>24 task or that responsibility, you should</p> <p>25 already know what you're supposed to be</p>	<p style="text-align: right;">Page 101</p> <p>1 Dos Reis</p> <p>2 private school community than public school</p> <p>3 community. That's why I feel that it was</p> <p>4 unfair.</p> <p>5 Q. When you say "the school board</p> <p>6 should be a reflection of the community,"</p> <p>7 which community?</p> <p>8 A. The entire East Ramapo school</p> <p>9 district.</p> <p>10 Q. Private school parents and</p> <p>11 public school parents?</p> <p>12 A. Yes.</p> <p>13 Q. I want to be clear, does that</p> <p>14 have anything to do with race?</p> <p>15 A. Well, we have Latinos, we have</p> <p>16 Black students, we have White students, so</p> <p>17 yes, the board should reflect that,</p> <p>18 absolutely.</p> <p>19 Q. There are three Black members of</p> <p>20 the school board right now, right?</p> <p>21 A. Yes.</p> <p>22 Q. There are six White members of</p> <p>23 the school board, right?</p> <p>24 A. Yes.</p> <p>25 Q. Is that not reflective of the</p>

<p style="text-align: right;">Page 102</p> <p>1 Dos Reis</p> <p>2 population of the community?</p> <p>3 A. No, no.</p> <p>4 Q. Why not?</p> <p>5 A. There are no Latinos sitting on</p> <p>6 the board. We do not have -- we don't have</p> <p>7 any educators sitting on that board that I</p> <p>8 know of. Mr. Pierre and Mr. Charles do not</p> <p>9 currently have any children in school, in</p> <p>10 the schools, and so it's really not -- you</p> <p>11 know, we just don't feel that they represent</p> <p>12 everyone.</p> <p>13 Q. But isn't it a candidate's job</p> <p>14 to persuade voters that they should be</p> <p>15 elected so that they can represent the</p> <p>16 community fairly?</p> <p>17 A. Yes.</p> <p>18 Q. Then why do you need this</p> <p>19 lawsuit?</p> <p>20 A. Because we need better</p> <p>21 representation on the board.</p> <p>22 Q. All right. But isn't it your</p> <p>23 job to persuade voters that you need better</p> <p>24 representation on the board?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 104</p> <p>1 Dos Reis</p> <p>2 community, right?</p> <p>3 A. Yes.</p> <p>4 Q. If Mr. Germain can do it and</p> <p>5 he's a Black man, why couldn't you?</p> <p>6 A. Because I don't know how he</p> <p>7 obtained that support.</p> <p>8 Q. He offered to help you?</p> <p>9 A. Okay. Yes.</p> <p>10 Q. You rejected him?</p> <p>11 A. Well, I told him that I didn't</p> <p>12 think that I needed to specifically ask</p> <p>13 anyone for help. If you believe in what I'm</p> <p>14 saying and my platform, then you come on and</p> <p>15 vote.</p> <p>16 Q. Do you think sometimes in</p> <p>17 politics maybe you do need to ask people for</p> <p>18 help?</p> <p>19 A. I guess so.</p> <p>20 Q. Right.</p> <p>21 So there wasn't anything about</p> <p>22 the way the district functions that stopped</p> <p>23 you from getting support in the White</p> <p>24 community, was there?</p> <p>25 MS. CALABRESE: Objection.</p>
<p style="text-align: right;">Page 103</p> <p>1 Dos Reis</p> <p>2 Q. So why do you need this lawsuit?</p> <p>3 MR. PEARCE: Objection.</p> <p>4 Q. Did anything stop you from</p> <p>5 persuading voters of your position?</p> <p>6 A. The only obstacle was the one</p> <p>7 that I mentioned earlier about feeling not</p> <p>8 welcome in certain communities, so then half</p> <p>9 of the voting base was blocked off to us.</p> <p>10 We couldn't, you know, get into, you know,</p> <p>11 certain communities to speak because we were</p> <p>12 told that we would not be well received.</p> <p>13 Q. That didn't stop Bernard</p> <p>14 Charles, did it?</p> <p>15 MR. PEARCE: Objection.</p> <p>16 A. I don't know.</p> <p>17 Q. That didn't stop Pierre Germain,</p> <p>18 did it?</p> <p>19 MR. PEARCE: Objection.</p> <p>20 A. I don't know.</p> <p>21 Q. They offered to help you, didn't</p> <p>22 they?</p> <p>23 A. Mr. Pierre offered to help me.</p> <p>24 Q. And Mr. Germain won his seat</p> <p>25 with support from the private school</p>	<p style="text-align: right;">Page 105</p> <p>1 Dos Reis</p> <p>2 A. Could you rephrase that?</p> <p>3 Q. Yes.</p> <p>4 The way elections are run in a</p> <p>5 school district, that's not what stopped you</p> <p>6 from getting support in the White community,</p> <p>7 is it?</p> <p>8 MR. PEARCE: Objection.</p> <p>9 A. I don't -- I'm trying to --</p> <p>10 okay. East Ramapo is extremely diverse,</p> <p>11 right, but we have pockets of areas that are</p> <p>12 predominantly of a particular group of</p> <p>13 people, and, you know, I believe in this</p> <p>14 lawsuit for the purposes of being able to</p> <p>15 get representation from -- for the entire</p> <p>16 district. So there are nine seats on the</p> <p>17 board, and if we could get nine people from</p> <p>18 different areas of East Ramapo that are</p> <p>19 willing to represent all of the children in</p> <p>20 East Ramapo, I feel that that would be more</p> <p>21 fair in our district.</p> <p>22 Q. That would be more fair. Is the</p> <p>23 current way elections are run unfair?</p> <p>24 A. Yes.</p> <p>25 Q. Why?</p>

<p style="text-align: right;">Page 106</p> <p>1 Dos Reis</p> <p>2 A. Because the preferred candidates</p> <p>3 of private school communities seem to be the</p> <p>4 ones who are more often elected onto the</p> <p>5 school board.</p> <p>6 Q. Right. Because they get more</p> <p>7 votes, right?</p> <p>8 A. Yes.</p> <p>9 Q. Why is that unfair?</p> <p>10 A. The people in East Ramapo,</p> <p>11 especially those from the public school</p> <p>12 community, have very low morale at this</p> <p>13 point because we've lost so many elections.</p> <p>14 People don't feel that it's -- that their</p> <p>15 vote counts, that it's going to make a</p> <p>16 difference. And so because private</p> <p>17 school -- the private school community</p> <p>18 consistently is able to vote their</p> <p>19 candidates in, it has changed the dynamic in</p> <p>20 how people in the public school community --</p> <p>21 whether or not they come out and vote.</p> <p>22 Q. Just so I'm clear, when you say</p> <p>23 "public school community" in this context,</p> <p>24 you mean just Black people?</p> <p>25 A. No.</p>	<p style="text-align: right;">Page 108</p> <p>1 Dos Reis</p> <p>2 parents do not feel represented by the</p> <p>3 school board, and so when you're constantly</p> <p>4 going up and you're speaking at school board</p> <p>5 meetings and you're saying to the school</p> <p>6 board why does my child not have a teacher</p> <p>7 consistently, why do we lack substitutes,</p> <p>8 why are our students being sent to the</p> <p>9 cafeteria for whole periods, why don't we</p> <p>10 have school trips, why are there wires</p> <p>11 hanging from the ceiling, why are there</p> <p>12 stairs falling apart, why do we have caution</p> <p>13 tape all over the schools and outside, and</p> <p>14 you don't get a response, not even so much</p> <p>15 as the school board members even looking at</p> <p>16 you when you're talking to them, it is</p> <p>17 frustrating, and then what happens is people</p> <p>18 walk away saying my vote, my voice doesn't</p> <p>19 count.</p> <p>20 Q. Let's see if we can sum this up.</p> <p>21 Are elections in East Ramapo</p> <p>22 driven by the race of the voters?</p> <p>23 A. I don't know.</p> <p>24 Q. What's the main thing in your</p> <p>25 mind that determines how elections are going</p>
<p style="text-align: right;">Page 107</p> <p>1 Dos Reis</p> <p>2 Q. Do you mean just Latino people?</p> <p>3 A. No.</p> <p>4 Q. Do you mean White people?</p> <p>5 A. I mean the public school</p> <p>6 community, which is a diverse community.</p> <p>7 It's made up mostly, though, of people of</p> <p>8 color.</p> <p>9 Q. It's not defined by race, is it?</p> <p>10 A. No.</p> <p>11 Q. So the private school community</p> <p>12 wins elections because they get more votes,</p> <p>13 right?</p> <p>14 A. That's how it would appear.</p> <p>15 Q. Right.</p> <p>16 And the public school community</p> <p>17 losses elections because they get less</p> <p>18 votes, right?</p> <p>19 A. Yes.</p> <p>20 Q. What's unfair about that?</p> <p>21 A. What's unfair is that the public</p> <p>22 school community feels beaten. They have</p> <p>23 low morale based upon the fact that we do</p> <p>24 consistently lose and don't -- and then</p> <p>25 what's happening is that public school</p>	<p style="text-align: right;">Page 109</p> <p>1 Dos Reis</p> <p>2 to come out in East Ramapo?</p> <p>3 A. I don't know.</p> <p>4 Q. Have you ever run for any other</p> <p>5 political office?</p> <p>6 A. I did after, after running for</p> <p>7 school board.</p> <p>8 Q. What office?</p> <p>9 A. Village of trust -- trustee for</p> <p>10 the village.</p> <p>11 Q. The Village of Spring Valley?</p> <p>12 A. Yes.</p> <p>13 Q. Did you win?</p> <p>14 A. No.</p> <p>15 Q. How many votes did you get?</p> <p>16 A. Honestly, I don't remember.</p> <p>17 Q. Do you know how many other</p> <p>18 people were running for the same position?</p> <p>19 A. There were about eight of us</p> <p>20 running. Um-hum.</p> <p>21 Q. Do you recall how you placed</p> <p>22 among the candidates?</p> <p>23 A. What do you mean?</p> <p>24 Q. Number 2, Number 4?</p> <p>25 A. I don't recall exactly how they</p>

<p style="text-align: right;">Page 110</p> <p>1 Dos Reis</p> <p>2 placed us.</p> <p>3 Q. Why do you think you didn't win</p> <p>4 that election?</p> <p>5 MR. PEARCE: Objection.</p> <p>6 A. With that election I think it's</p> <p>7 just because I was new. I know a lot of</p> <p>8 people, but not as many, and my name isn't</p> <p>9 as known as some of the other people who</p> <p>10 ran.</p> <p>11 Q. Is that different than the</p> <p>12 school board election?</p> <p>13 A. No, not in the case of this</p> <p>14 school board election.</p> <p>15 Q. So for the same reasons you were</p> <p>16 unsuccessful?</p> <p>17 MR. PEARCE: Objection.</p> <p>18 A. No.</p> <p>19 Q. You were unsuccessful for</p> <p>20 different reasons?</p> <p>21 A. Yes.</p> <p>22 Q. What was different?</p> <p>23 A. Well, with the school board</p> <p>24 election, for the exception of one of our</p> <p>25 opponents, the other two were not known, at</p>	<p style="text-align: right;">Page 112</p> <p>1 Dos Reis</p> <p>2 Q. What would you do different?</p> <p>3 A. Well, I would try and -- I would</p> <p>4 try and get -- how do you say -- have</p> <p>5 interaction with more -- I would try and</p> <p>6 interact with more people.</p> <p>7 Q. Would you ever run for the</p> <p>8 school board again?</p> <p>9 A. Yes.</p> <p>10 Q. Would you do anything different?</p> <p>11 A. It's the same thing, I would try</p> <p>12 and -- just try and get my information out</p> <p>13 to more people, if I could.</p> <p>14 Q. Do you think you would have</p> <p>15 better success if you did something</p> <p>16 different?</p> <p>17 MR. PEARCE: Objection.</p> <p>18 A. With the way things are now,</p> <p>19 currently, no.</p> <p>20 Q. Do you think you'd have success</p> <p>21 if you took Mr. Germain up on his offer?</p> <p>22 A. I don't know.</p> <p>23 Q. Is it possible?</p> <p>24 MR. PEARCE: Objection.</p> <p>25 A. I don't know.</p>
<p style="text-align: right;">Page 111</p> <p>1 Dos Reis</p> <p>2 least not to the public school community</p> <p>3 they weren't known, so -- and from what I</p> <p>4 understand, they both -- both -- two of our</p> <p>5 opponents were running for the first time</p> <p>6 just like we were, the three of us, so to me</p> <p>7 it was more of kind of same playing field</p> <p>8 versus in the other election, out of the</p> <p>9 eight of us that were running, like four of</p> <p>10 them were much more well known than the</p> <p>11 others.</p> <p>12 Q. Spring Valley is just a subset</p> <p>13 of East Ramapo, right?</p> <p>14 A. It's one of the towns within</p> <p>15 East Ramapo.</p> <p>16 Q. Right.</p> <p>17 Spring Valley is a diverse</p> <p>18 community?</p> <p>19 A. Yes.</p> <p>20 Q. Are you going to run again for</p> <p>21 the board trustee of Spring Valley?</p> <p>22 A. I don't know.</p> <p>23 Q. If you did, would you do</p> <p>24 anything different?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 113</p> <p>1 Dos Reis</p> <p>2 MR. LEVINE: No further</p> <p>3 questions.</p> <p>4 MS. CALABRESE: Do you want to</p> <p>5 talk for a second?</p> <p>6 MR. PEARCE: Do you want to talk</p> <p>7 for a few seconds?</p> <p>8 MS. MATTHEWS: I have a few</p> <p>9 questions. I don't know if you want</p> <p>10 to do it now, do you want to take a</p> <p>11 break. I will be very quick. I want</p> <p>12 to get you out of here.</p> <p>13 MS. CALABRESE: Do you need a</p> <p>14 break? Let's take at least two</p> <p>15 minutes.</p> <p>16 MR. LEVINE: Let's take a full</p> <p>17 five minutes.</p> <p>18 (Recess taken.)</p> <p>19 EXAMINATION BY</p> <p>20 MS. MATTHEWS:</p> <p>21 Q. Good afternoon. My name is</p> <p>22 Elyce Matthew. I'm from the Attorney</p> <p>23 General's Office, and I represent MaryEllen</p> <p>24 Elia, who is the commissioner of education</p> <p>25 in this case. I just have a couple quick</p>

<p style="text-align: right;">Page 114</p> <p>1 Dos Reis</p> <p>2 questions for you.</p> <p>3 Have you ever made any sort of</p> <p>4 appeal or complaint to the New York State</p> <p>5 Education Department?</p> <p>6 A. I'm sorry, what was the first</p> <p>7 thing you said?</p> <p>8 Q. Like an appeal or a complaint of</p> <p>9 some sort.</p> <p>10 A. Yes, we did.</p> <p>11 Q. What was the nature of that</p> <p>12 appeal or complaint -- first of all, was it</p> <p>13 an appeal or a complaint?</p> <p>14 A. It was a letter that was sent to</p> <p>15 Commissioner Elia just stating what the</p> <p>16 frustrations were of many of the parents in</p> <p>17 East Ramapo.</p> <p>18 Q. And did you write that letter?</p> <p>19 A. I did not write it.</p> <p>20 Q. Who wrote that letter?</p> <p>21 A. You know, I'm not sure if it was</p> <p>22 Mr. White or Mr. Mandel.</p> <p>23 Q. Mr. Steve White, is that the</p> <p>24 person you're referring to?</p> <p>25 A. Steve White is the person -- is</p>	<p style="text-align: right;">Page 116</p> <p>1 Dos Reis</p> <p>2 commissioner or to someone else?</p> <p>3 A. No, there was one specifically</p> <p>4 to the commissioner.</p> <p>5 Q. What were the contents of the</p> <p>6 letter, anything that you could remember?</p> <p>7 A. To the commissioner, it had to</p> <p>8 do with -- it was two different events that</p> <p>9 took place. That letter was the -- that</p> <p>10 first one, if I recall carefully, was about</p> <p>11 transportation. It was about</p> <p>12 transportation.</p> <p>13 Q. What kind of transportation?</p> <p>14 A. From what we understood, the</p> <p>15 school board -- some of the school board</p> <p>16 members wanted to add non-mandated busing</p> <p>17 days, which would have cost the district</p> <p>18 millions of dollars.</p> <p>19 Q. Did the letter deal with any</p> <p>20 other issues that you recall?</p> <p>21 A. The transportation was the main</p> <p>22 issue.</p> <p>23 Q. Do you know if that letter had</p> <p>24 anything to do with board elections that we</p> <p>25 were talking about before?</p>
<p style="text-align: right;">Page 115</p> <p>1 Dos Reis</p> <p>2 one of our community leaders, and Andrew</p> <p>3 Mandel also.</p> <p>4 Q. Andrew Mandel. Is it</p> <p>5 M-A-N-D-E-L?</p> <p>6 A. M-A-N-D-E-L.</p> <p>7 Q. When was this letter written, if</p> <p>8 you know, approximately?</p> <p>9 A. I believe it was in April of</p> <p>10 2017.</p> <p>11 Q. And how were you affiliated with</p> <p>12 the letter; did you sign the letter or you</p> <p>13 just read it?</p> <p>14 A. With that letter, we reached out</p> <p>15 to her on two separate occasions that I can</p> <p>16 remember. I believe with the letter, I</p> <p>17 don't think -- not that I physically signed</p> <p>18 it, but that I agreed to having read it and</p> <p>19 that I agreed with the statement.</p> <p>20 Q. And did an organization send</p> <p>21 that letter to you?</p> <p>22 A. It would have been Strong East</p> <p>23 Ramapo.</p> <p>24 Q. And is it your understanding</p> <p>25 that that letter was directed to the</p>	<p style="text-align: right;">Page 117</p> <p>1 Dos Reis</p> <p>2 A. I don't think so, not with board</p> <p>3 elections, not that one.</p> <p>4 Q. And then I think you said there</p> <p>5 was a second letter?</p> <p>6 A. We did have a second issue, but</p> <p>7 I wasn't a part of that one, not -- yeah,</p> <p>8 not as I was with the first one.</p> <p>9 Q. Do you remember anything else</p> <p>10 about that other letter?</p> <p>11 A. About the second letter? The</p> <p>12 first time was about -- it was a concern</p> <p>13 about the addition of non-mandated busing</p> <p>14 days. And in the second time, a letter was</p> <p>15 sent, but I don't believe -- I'm not sure if</p> <p>16 it was sent to Commissioner Elia or someone</p> <p>17 else; however, it had to do with</p> <p>18 Commissioner Elia coming down and having a</p> <p>19 meeting in private with some of the school</p> <p>20 board members and agreeing to having the</p> <p>21 non-mandated busing days. So really that</p> <p>22 was the issue, but it was dealt with on two</p> <p>23 separate occasions.</p> <p>24 Q. So both letters dealt with this</p> <p>25 transportation issue?</p>

<p style="text-align: right;">Page 118</p> <p>1 Dos Reis</p> <p>2 A. The second letter had -- I</p> <p>3 believe there was something else with the</p> <p>4 second letter, but I don't -- I didn't have</p> <p>5 really anything to do with that one.</p> <p>6 Q. How did you learn about the</p> <p>7 letter?</p> <p>8 A. I learned about it through</p> <p>9 Strong East Ramapo.</p> <p>10 Q. So we've talked about two</p> <p>11 letters -- well, first of all, when was the</p> <p>12 second letter, if you recall?</p> <p>13 A. Certainly -- the second</p> <p>14 letter -- okay, so the board put up for a</p> <p>15 vote on non-mandated busing days. A letter</p> <p>16 was written to Commissioner Elia stating our</p> <p>17 concerns about that. Everything happened</p> <p>18 like within a month. And then we learned</p> <p>19 that she had had a private meeting with some</p> <p>20 of the school board members. And then we</p> <p>21 approached -- they sent another letter to</p> <p>22 her and, I believe, Regent Johnson about</p> <p>23 that meeting that took place because one of</p> <p>24 the school board members didn't even have</p> <p>25 any knowledge that that meeting was taking</p>	<p style="text-align: right;">Page 120</p> <p>1 Dos Reis</p> <p>2 A. And Commissioner Elia, yes.</p> <p>3 Q. How do you know about that</p> <p>4 meeting?</p> <p>5 A. When the -- the school board</p> <p>6 member that didn't know about it, like when</p> <p>7 they presented, that's what happened. When</p> <p>8 they presented at the school board meeting</p> <p>9 that Commissioner Elia had signed off, had</p> <p>10 agreed to non-mandated busing, one of the</p> <p>11 school board members said at the meeting she</p> <p>12 knew nothing about that.</p> <p>13 Q. How do you know there was a</p> <p>14 meeting that took place?</p> <p>15 A. I don't recall exactly how it</p> <p>16 came out, but it came to fruition that a</p> <p>17 meeting had taken place with only some of</p> <p>18 the school board members. I just don't</p> <p>19 remember exactly how it came out.</p> <p>20 Q. Do you know when that meeting</p> <p>21 was?</p> <p>22 A. I -- exactly when, I don't know.</p> <p>23 Q. But you weren't at that meeting?</p> <p>24 A. No.</p> <p>25 Q. Do you know where it took place?</p>
<p style="text-align: right;">Page 119</p> <p>1 Dos Reis</p> <p>2 place, which we felt was inappropriate. And</p> <p>3 so another letter was sent in reference to</p> <p>4 that private meeting and then Commissioner</p> <p>5 Elia agreeing to more non-mandated busing.</p> <p>6 Q. How did you find out all of that</p> <p>7 information; were you present at meetings or</p> <p>8 were you --</p> <p>9 A. I was present.</p> <p>10 Q. -- told by other people?</p> <p>11 A. I was present at the school</p> <p>12 board meetings that took place at that time.</p> <p>13 And what happened was with Commissioner</p> <p>14 Elia, I don't remember who it was, but</p> <p>15 someone said, no, Commissioner Elia agreed</p> <p>16 to this, she had signed off on it, and it</p> <p>17 was presented at a school board meeting.</p> <p>18 However, one of the school board</p> <p>19 members stated that she knew nothing of the</p> <p>20 situation with the non-mandated busing, and</p> <p>21 that's how it came out that there was a</p> <p>22 meeting that took place with only some of</p> <p>23 the school board members.</p> <p>24 Q. The meeting with some of the</p> <p>25 school board members and Commissioner --</p>	<p style="text-align: right;">Page 121</p> <p>1 Dos Reis</p> <p>2 A. No.</p> <p>3 Q. Do you know who was at the</p> <p>4 meeting specifically?</p> <p>5 A. When it came out, what came out</p> <p>6 was that Weissmandl was there, Dr. Wortham</p> <p>7 was there, the two state monitors were on</p> <p>8 the phone. They weren't there physically.</p> <p>9 They were on the phone. That's how it came</p> <p>10 out. That's how it came out, in a meeting</p> <p>11 that we had with state monitors. That's how</p> <p>12 it came out.</p> <p>13 We were very upset about</p> <p>14 everything that was happening with the</p> <p>15 non-mandated busing, and we had a meeting</p> <p>16 with the state monitors, and that's how --</p> <p>17 it's just like between different meetings</p> <p>18 with different people it came out that the</p> <p>19 state monitors were on the phone,</p> <p>20 Dr. Wortham was there, Weissmandl was there,</p> <p>21 and another school board was there, I don't</p> <p>22 recall who the other one was, and they had</p> <p>23 met about adding the non-mandated busing.</p> <p>24 Q. Which two monitors are you</p> <p>25 referring to?</p>


<p style="text-align: right;">Page 122</p> <p>1 Dos Reis</p> <p>2 A. Mr. Sipple and -- I forgot.</p> <p>3 Hold on. I see his name. Szuberla.</p> <p>4 Szuberla and Sipple.</p> <p>5 Q. Is there anything else you</p> <p>6 recall about the transportation issue</p> <p>7 besides the two letters and the meeting we</p> <p>8 talked about with respect to the</p> <p>9 commissioner?</p> <p>10 A. No. To the commissioner, no.</p> <p>11 Q. So beyond those two letters and</p> <p>12 the meetings, do you recall any other</p> <p>13 appeals or complaints to the State Education</p> <p>14 Department that you have made personally?</p> <p>15 A. No. Me personally, no. I've</p> <p>16 signed off on other things that came around.</p> <p>17 Q. What kind of things?</p> <p>18 A. Like when we requested the state</p> <p>19 monitors, they sent out like petitions for</p> <p>20 the state monitor, I signed off on that.</p> <p>21 Q. Okay. So not a petition where a</p> <p>22 lot of people have signed off on something,</p> <p>23 but a letter you've written or appeal you've</p> <p>24 filed or a complaint or something like that,</p> <p>25 do you recall any other times?</p>	<p style="text-align: right;">Page 124</p> <p>1 Dos Reis</p> <p>2 asked any questions.</p> <p>3 MR. PEARCE: Yes.</p> <p>4 MS. CALABRESE: But you said you</p> <p>5 were done, Randy. You guys need to</p> <p>6 communicate better.</p> <p>7 MR. LEVINE: That's interesting.</p> <p>8 MS. CALABRESE: Do you want to</p> <p>9 pull out the rules?</p> <p>10 MR. LEVINE: Are you going to</p> <p>11 instruct your witness not to answer?</p> <p>12 MS. CALABRESE: Yes, because you</p> <p>13 already said you were done with her.</p> <p>14 MR. LEVINE: Okay. Let's note</p> <p>15 for the record that the deposition is</p> <p>16 ongoing, the State has asked</p> <p>17 questions, I would like to redirect, I</p> <p>18 have questions for the witness, and</p> <p>19 witness's counsel is going to direct</p> <p>20 the witness not to answer them. So</p> <p>21 I'll ask my questions, you can direct</p> <p>22 her not to answer them.</p> <p>23 MS. CALABRESE: Can we take a</p> <p>24 break here so that Tom and I can talk?</p> <p>25 MR. LEVINE: If you would like.</p>
<p style="text-align: right;">Page 123</p> <p>1 Dos Reis</p> <p>2 A. No.</p> <p>3 Q. Do you recall any appeals or</p> <p>4 complaints to the State Education Department</p> <p>5 specifically around the issue of the board's</p> <p>6 election or about voting systems or anything</p> <p>7 like that?</p> <p>8 A. No.</p> <p>9 MS. MATTHEWS: Thank you.</p> <p>10 That's all of I have.</p> <p>11 MR. LEVINE: I have two</p> <p>12 questions.</p> <p>13 MS. CALABRESE: You don't get to</p> <p>14 do more questions.</p> <p>15 MR. LEVINE: Why not?</p> <p>16 THE WITNESS: Because you said</p> <p>17 you were done.</p> <p>18 MS. CALABRESE: Yeah, you said</p> <p>19 you were done.</p> <p>20 MR. LEVINE: No, I get to do a</p> <p>21 redirect.</p> <p>22 MS. CALABRESE: No. You're both</p> <p>23 on the same time. If we were to ask</p> <p>24 questions, then you can cross -- yes,</p> <p>25 you can cross again, but we haven't</p>	<p style="text-align: right;">Page 125</p> <p>1 Dos Reis</p> <p>2 MS. CALABRESE: I would like.</p> <p>3 MR. LEVINE: Okay. Five-minute</p> <p>4 break.</p> <p>5 (Recess taken.)</p> <p>6 MS. CALABRESE: We object to the</p> <p>7 district asking any further questions.</p> <p>8 We believe it is outside the scope of</p> <p>9 the rules and that the district</p> <p>10 already rested and that it is not</p> <p>11 permitted to ask questions even though</p> <p>12 the defendant commissioner had further</p> <p>13 questions, but we are going to permit</p> <p>14 the witness to answer questions so</p> <p>15 that we can hopefully spare any return</p> <p>16 of the witness, but we object to any</p> <p>17 questions going forward.</p> <p>18 To the extent that the district</p> <p>19 has any further questions, at the very</p> <p>20 least they should be limited to the</p> <p>21 scope of the commissioner's questions,</p> <p>22 but we object to any questions</p> <p>23 happening at all.</p> <p>24 MR. LEVINE: Objection noted.</p> <p>25 //</p>

<p style="text-align: right;">Page 126</p> <p>1 Dos Reis</p> <p>2 EXAMINATION BY (CONTD)</p> <p>3 MR. LEVINE:</p> <p>4 Q. Just a few more questions.</p> <p>5 Earlier in the deposition I</p> <p>6 specifically asked you if you thought that</p> <p>7 the school district was spending too much</p> <p>8 money on busing for private school students;</p> <p>9 do you remember that?</p> <p>10 A. Yes.</p> <p>11 Q. Do you remember how you</p> <p>12 answered?</p> <p>13 A. Right, I said -- I think I said</p> <p>14 no.</p> <p>15 Q. Right.</p> <p>16 So the State just asked you a</p> <p>17 question about whether you had sent any</p> <p>18 letters or signed onto any letters to the</p> <p>19 commissioner and you specifically mentioned</p> <p>20 one where you were objecting to a policy of</p> <p>21 the school district to provide non-mandated</p> <p>22 busing to private schools, right?</p> <p>23 A. They wanted additional. Not</p> <p>24 that they -- not that they wanted it period,</p> <p>25 but that they wanted -- they already have</p>	<p style="text-align: right;">Page 128</p> <p>1 Dos Reis</p> <p>2 A. They sent the letter objecting</p> <p>3 to additional non-mandating busing.</p> <p>4 Q. Isn't that a policy position?</p> <p>5 A. I didn't think it was.</p> <p>6 Q. Are there any other positions</p> <p>7 like that objecting to a specific thing that</p> <p>8 the district does or wants to do from Strong</p> <p>9 East Ramapo?</p> <p>10 A. Not that I can recall.</p> <p>11 MS. CALABRESE: Objection.</p> <p>12 Q. Do you know what I mean when I</p> <p>13 say "policy"?</p> <p>14 A. When you say "policy," my</p> <p>15 thought is something like almost like a law</p> <p>16 to be enacted.</p> <p>17 Q. Assume when I say "policy," I</p> <p>18 mean anything the school district does,</p> <p>19 okay?</p> <p>20 A. Oh, okay.</p> <p>21 MR. PEARCE: Objection.</p> <p>22 Q. Does Strong East Ramapo take</p> <p>23 positions on any school district policies?</p> <p>24 A. Does Strong East Ramapo take a</p> <p>25 position on anything the school board does;</p>
<p style="text-align: right;">Page 127</p> <p>1 Dos Reis</p> <p>2 non-mandated busing. They wanted additional</p> <p>3 non-mandated busing.</p> <p>4 Q. Are they providing that</p> <p>5 additional non-mandated busing now?</p> <p>6 A. No. It was voted down by the</p> <p>7 people.</p> <p>8 Q. By what people?</p> <p>9 A. Everyone. It was put --</p> <p>10 Q. What people?</p> <p>11 A. East Ramapo school district.</p> <p>12 Q. Like in the budget vote?</p> <p>13 A. Yes.</p> <p>14 Q. So another question that I asked</p> <p>15 you related to whether Strong East Ramapo</p> <p>16 takes positions on district policies?</p> <p>17 A. Um-hum.</p> <p>18 Q. Do you remember how you answered</p> <p>19 that question?</p> <p>20 A. Right. I said, no.</p> <p>21 Q. Right.</p> <p>22 Didn't you just testify that</p> <p>23 Strong East Ramapo sent a letter to the</p> <p>24 commissioner objecting to the proposed</p> <p>25 non-mandated busing policy?</p>	<p style="text-align: right;">Page 129</p> <p>1 Dos Reis</p> <p>2 is that correct, is that what you're asking?</p> <p>3 Q. Yes.</p> <p>4 A. On anything that the school</p> <p>5 board does?</p> <p>6 Q. Yes.</p> <p>7 A. Well, I'm not sure if this is</p> <p>8 what you mean, but I objected to -- and I</p> <p>9 voiced that objection in the school board</p> <p>10 meeting -- about hiring a bus company that</p> <p>11 was known for violations. Is that what you</p> <p>12 mean?</p> <p>13 Q. I --</p> <p>14 A. But that was me like personally.</p> <p>15 So other than that, I really haven't -- and</p> <p>16 that I know of with Strong East Ramapo, no.</p> <p>17 Q. Do you remember earlier when I</p> <p>18 asked if the board had done anything that</p> <p>19 you might have done differently?</p> <p>20 MS. CALABRESE: No. This is</p> <p>21 outside the scope of the cross.</p> <p>22 MR. LEVINE: No, it's not,</p> <p>23 because we're talking about</p> <p>24 non-mandated busing.</p> <p>25 Are you instructing your witness</p>

<p style="text-align: right;">Page 130</p> <p>1 Dos Reis</p> <p>2 not to answer?</p> <p>3 MS. CALABRESE: Your question</p> <p>4 was not --</p> <p>5 MR. LEVINE: Are you instructing</p> <p>6 your witness not to answer?</p> <p>7 MS. CALABRESE: Would you like</p> <p>8 to rephrase your question so that it</p> <p>9 actually refers to transportation?</p> <p>10 MR. LEVINE: My question -- are</p> <p>11 you finished, by the way?</p> <p>12 Q. My question is: Do you recall</p> <p>13 when I asked you if the board had done</p> <p>14 anything that you would do differently, do</p> <p>15 you remember what you said?</p> <p>16 A. I believe I said, no.</p> <p>17 Q. Right. What about this issue</p> <p>18 with the contractor that you just described</p> <p>19 involving the busing, wasn't that something?</p> <p>20 A. Well, they hadn't done it. They</p> <p>21 put it out there for people to vote on to</p> <p>22 say how -- it was something that they were</p> <p>23 considering, but they hadn't actually done</p> <p>24 it.</p> <p>25 Q. Have they done it since then?</p>	<p style="text-align: right;">Page 132</p> <p>1 Dos Reis</p> <p>2 forth in one of the meetings that they were</p> <p>3 considering this particular transportation</p> <p>4 company, and so then we have the right to</p> <p>5 speak in the beginning of meetings and state</p> <p>6 any concerns that we have. And a lot of</p> <p>7 people stated their concerns with this</p> <p>8 transportation -- with this transportation</p> <p>9 company because of violations that that</p> <p>10 company had had where they put children's</p> <p>11 lives at risk.</p> <p>12 So it may not necessarily be --</p> <p>13 it could be that maybe they did more</p> <p>14 homework on it and then decided that it</p> <p>15 wasn't in the best interests of all the</p> <p>16 children.</p> <p>17 Q. But it didn't go forward, right?</p> <p>18 A. It didn't go forward, right.</p> <p>19 Q. You opposed a proposal to add</p> <p>20 non-mandated busing days for private school</p> <p>21 students, right?</p> <p>22 A. Say that again.</p> <p>23 Q. You opposed a proposal to add</p> <p>24 non-mandated busing days for private school</p> <p>25 students, right?</p>
<p style="text-align: right;">Page 131</p> <p>1 Dos Reis</p> <p>2 A. No, because they considered it,</p> <p>3 they put it out there, the people said they</p> <p>4 didn't want it, and so then they didn't do</p> <p>5 it.</p> <p>6 Q. So would you say the board was</p> <p>7 responsive to the people's concerns?</p> <p>8 A. In that particular instance.</p> <p>9 Then again, we really don't know, because</p> <p>10 there were other issues with that</p> <p>11 transportation that, you know -- there were</p> <p>12 other issues that came up, the fact that</p> <p>13 they had numerous violations and had been</p> <p>14 dropped by other companies, so it could be</p> <p>15 because of their track record that they</p> <p>16 decided not to go with them.</p> <p>17 Q. Didn't you say that this</p> <p>18 decision was put out to a vote?</p> <p>19 A. Not to a vote, but it is that</p> <p>20 the school board has to discuss, you know,</p> <p>21 what they're going to vote on, and when they</p> <p>22 put it out that they were considering --</p> <p>23 they didn't even put it out there. Let me</p> <p>24 think.</p> <p>25 Yes, it was put out, it was put</p>	<p style="text-align: right;">Page 133</p> <p>1 Dos Reis</p> <p>2 A. Yes. Additional, yes.</p> <p>3 Q. Who proposed that?</p> <p>4 A. The school board.</p> <p>5 Q. Do you know who on the school</p> <p>6 board?</p> <p>7 A. Specifically, no.</p> <p>8 Q. Do you know who voted for that</p> <p>9 proposal?</p> <p>10 A. No.</p> <p>11 Q. Do you know who supported that</p> <p>12 proposal?</p> <p>13 A. No.</p> <p>14 Q. Do you know if the private</p> <p>15 school community supported that proposal?</p> <p>16 A. At board meetings that I</p> <p>17 attended there were private school parents</p> <p>18 who came forward and stated that they were</p> <p>19 in support of the non-mandated -- the</p> <p>20 additional non-mandated busing.</p> <p>21 Q. You disagreed with them, right?</p> <p>22 A. Well, I disagreed with the</p> <p>23 additional days, yes.</p> <p>24 Q. Did you speak at board meetings</p> <p>25 saying you disagreed with the additional</p>

<p style="text-align: right;">Page 134</p> <p>1 Dos Reis</p> <p>2 non-mandated busing?</p> <p>3 A. I don't remember exactly. I</p> <p>4 spoke twice in front of the school board.</p> <p>5 One in particular was about the</p> <p>6 transportation company that they wanted.</p> <p>7 And the second time I don't recall</p> <p>8 everything that I -- I don't recall what I</p> <p>9 said exactly, what I was, you know, speaking</p> <p>10 to the board about.</p> <p>11 Q. Was non-mandated busing one of</p> <p>12 the things?</p> <p>13 A. Yes. That was -- no. Not that,</p> <p>14 I'm sorry. I thought you were going to say</p> <p>15 the transportation company. No, I don't</p> <p>16 remember.</p> <p>17 Q. Do you remember any of the</p> <p>18 things that you said?</p> <p>19 A. In the second time, no.</p> <p>20 Q. Is there any other issue like</p> <p>21 the non-mandated busing that was supported</p> <p>22 by private school parents that you disagreed</p> <p>23 with?</p> <p>24 (**DI)MS. CALABRESE: Objection.</p> <p>25 That's outside the scope of the cross,</p>	<p style="text-align: right;">Page 136</p> <p>1 Dos Reis</p> <p>2 Q. The election was in May of 2017,</p> <p>3 right?</p> <p>4 A. Yes.</p> <p>5 Q. So this happened right before</p> <p>6 the election, didn't it?</p> <p>7 A. Yes.</p> <p>8 Q. Was this non-mandated busing</p> <p>9 days issue covered in the press?</p> <p>10 A. I don't recall.</p> <p>11 Q. Was this non-mandated busing</p> <p>12 issue well known in the public school</p> <p>13 community, for example?</p> <p>14 MR. PEARCE: Objection.</p> <p>15 A. I don't know.</p> <p>16 Q. Was this non-mandated busing</p> <p>17 issue important to the private school</p> <p>18 community?</p> <p>19 MR. PEARCE: Objection.</p> <p>20 A. I don't know how important.</p> <p>21 Q. Do you think that the additional</p> <p>22 days of non-mandated busing would have</p> <p>23 benefited private school parents?</p> <p>24 A. I don't know. But the reason</p> <p>25 why we disagreed with it was because it was</p>
<p style="text-align: right;">Page 135</p> <p>1 Dos Reis</p> <p>2 and yes, I'm going to instruct my</p> <p>3 witness not to answer, and you can</p> <p>4 call the magistrate.</p> <p>5 MR. LEVINE: Are you going to</p> <p>6 instruct her not to answer anymore</p> <p>7 question or just that question?</p> <p>8 (**DI)MS. CALABRESE: That one.</p> <p>9 If you want to stick to the scope of</p> <p>10 the cross, which is the letter sent to</p> <p>11 the commissioner, then by all means go</p> <p>12 ahead, but we're getting way beyond</p> <p>13 that now, and I let it go for a while,</p> <p>14 but now I'm not.</p> <p>15 MR. LEVINE: We will go ahead</p> <p>16 and put that on the record.</p> <p>17 Q. So the question was, was there</p> <p>18 anything else like the non-mandated busing</p> <p>19 proposal that the private school parents</p> <p>20 supported, but that you disagreed with?</p> <p>21 (**DI)MS. CALABRESE: Chevron,</p> <p>22 don't answer the question.</p> <p>23 Q. When was this debate over</p> <p>24 additional non-mandated busing days?</p> <p>25 A. Between March and April of 2017.</p>	<p style="text-align: right;">Page 137</p> <p>1 Dos Reis</p> <p>2 put out there right before the election and</p> <p>3 we just wanted more time to consider</p> <p>4 everything.</p> <p>5 Q. So are you saying you didn't</p> <p>6 oppose additional non-mandated busing?</p> <p>7 A. What we did was we said that it</p> <p>8 was too close to the election to put</p> <p>9 something like that out there.</p> <p>10 Q. Would the additional</p> <p>11 non-mandated busing have resulted in more</p> <p>12 cost to the school district?</p> <p>13 A. Yes. That was in addition.</p> <p>14 Q. Would those costs have to be</p> <p>15 included in the budget?</p> <p>16 A. Yes.</p> <p>17 Q. Does the budgets have to be</p> <p>18 approved by the voters on election day?</p> <p>19 A. Yes.</p> <p>20 Q. Would delaying until after the</p> <p>21 election have prevented the school district</p> <p>22 from adding additional non-mandated busing</p> <p>23 until the next year?</p> <p>24 MR. PEARCE: Objection.</p> <p>25 MS. CALABRESE: Objection.</p>

<p style="text-align: right;">Page 138</p> <p>1 Dos Reis</p> <p>2 A. I don't know.</p> <p>3 Q. How much would the additional</p> <p>4 days of non-mandated busing have cost?</p> <p>5 MR. PEARCE: Objection.</p> <p>6 A. I don't remember.</p> <p>7 Q. Did you oppose the proposed</p> <p>8 additional days of non-mandated busing</p> <p>9 because of the expense?</p> <p>10 A. That was one of the reasons,</p> <p>11 yes.</p> <p>12 Q. What were the other reasons?</p> <p>13 A. Because it was too close to the</p> <p>14 election for people to really be able to</p> <p>15 think about it and talk about it and then to</p> <p>16 make a sound decision on it.</p> <p>17 Q. Any other reasons?</p> <p>18 A. No.</p> <p>19 Q. Was there something more you</p> <p>20 needed to know about the proposed additional</p> <p>21 non-mandated busing to make up your mind?</p> <p>22 A. Yes.</p> <p>23 Q. What?</p> <p>24 A. How it was going to affect</p> <p>25 everyone else, everyone, everyone in East</p>	<p style="text-align: right;">Page 140</p> <p>1 Dos Reis</p> <p>2 Q. Did the proposal to add</p> <p>3 additional non-mandated busing for private</p> <p>4 school students make you angry?</p> <p>5 A. Not angry, but I was concerned,</p> <p>6 like why are you bringing something up right</p> <p>7 before the election that if it passes is</p> <p>8 going to cost money that no one can answer</p> <p>9 as to where it was going to come from.</p> <p>10 Q. So was there a difference of</p> <p>11 interests between the private school</p> <p>12 community and the public school community</p> <p>13 over this non-mandated busing issue?</p> <p>14 A. It's not a difference of</p> <p>15 interest. It was just a concern as to where</p> <p>16 that money was going to come from when we're</p> <p>17 already stretched way too thin.</p> <p>18 Q. Is that because you think there</p> <p>19 is only enough money to go for one or the</p> <p>20 other?</p> <p>21 MR. PEARCE: Objection.</p> <p>22 A. Not at all.</p> <p>23 Q. Did you talk with anybody on the</p> <p>24 school board directly about the non-mandated</p> <p>25 busing?</p>
<p style="text-align: right;">Page 139</p> <p>1 Dos Reis</p> <p>2 Ramapo.</p> <p>3 Q. I don't understand. What do you</p> <p>4 mean by that?</p> <p>5 A. We've lost a lot of services and</p> <p>6 we've lost a lot of teachers in the last</p> <p>7 couple of years, a lot, to the point where</p> <p>8 our students are sent to sit in a cafeteria</p> <p>9 for a whole period because we're missing</p> <p>10 teachers and we lack substitutes. There's a</p> <p>11 lot that our children are not getting now.</p> <p>12 And the excuse is because there's no money</p> <p>13 for it.</p> <p>14 So if there's no money for</p> <p>15 teachers and for substitutes and for</p> <p>16 services, then to ask for additional</p> <p>17 non-mandated busing days, that needed to be</p> <p>18 discussed and it needed to be -- it needed</p> <p>19 to be looked at very carefully because where</p> <p>20 was that money going to come from. If we</p> <p>21 already -- the board is claiming we don't</p> <p>22 have money, so then where was the money</p> <p>23 going to come from for non-mandated busing.</p> <p>24 That was the question. And nobody could</p> <p>25 answer that. That was an issue.</p>	<p style="text-align: right;">Page 141</p> <p>1 Dos Reis</p> <p>2 A. Directly, no.</p> <p>3 Q. Indirectly?</p> <p>4 MR. PEARCE: Objection.</p> <p>5 A. With the school board, no.</p> <p>6 Q. So you didn't talk to</p> <p>7 Mr. Charles about non-mandated busing?</p> <p>8 A. No.</p> <p>9 Q. You didn't talk to Mr. Germain</p> <p>10 about non-mandated busing?</p> <p>11 A. No.</p> <p>12 Q. What happened to the</p> <p>13 non-mandated busing proposal?</p> <p>14 A. They put it on the budget --</p> <p>15 they put it as an option in the budget</p> <p>16 voting.</p> <p>17 Q. What happened in the budget?</p> <p>18 A. It was voted down.</p> <p>19 Q. Was there --</p> <p>20 A. It was voted down, by the way,</p> <p>21 by both the private and the public</p> <p>22 communities.</p> <p>23 Q. Really?</p> <p>24 A. Yes.</p> <p>25 Q. By majorities of both</p>

<p style="text-align: right;">Page 142</p> <p>1 Dos Reis</p> <p>2 communities?</p> <p>3 A. I don't know.</p> <p>4 Q. That's interesting. Why do you</p> <p>5 think that is?</p> <p>6 MR. PEARCE: Objection.</p> <p>7 A. I don't know.</p> <p>8 Q. Was it because of the</p> <p>9 non-mandated budget proposal?</p> <p>10 A. I don't know.</p> <p>11 Q. Was a budget proposed for a</p> <p>12 revote, like a new budget?</p> <p>13 A. Yes, they had to put forth</p> <p>14 another budget, um-hum.</p> <p>15 Q. Did it include the non-mandated</p> <p>16 busing proposal?</p> <p>17 (Continued on following page.)</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 144</p> <p>1</p> <p>2 C E R T I F I C A T E</p> <p>3 STATE OF NEW YORK)</p> <p>4 : ss.</p> <p>5 COUNTY OF NEW YORK)</p> <p>6 I, THERESA TRAMONDO, a Notary</p> <p>7 Public within and for the State of New</p> <p>8 York, do hereby certify:</p> <p>9 That Chevon Dos Reis, the witness</p> <p>10 whose deposition is hereinbefore set</p> <p>11 forth, was duly sworn by me and that such</p> <p>12 deposition is a true record of the</p> <p>13 testimony given by the witness.</p> <p>14 I further certify that I am not</p> <p>15 related to any of the parties to this</p> <p>16 action by blood or marriage, and that I am</p> <p>17 in no way interested in the outcome of</p> <p>18 this matter.</p> <p>19 IN WITNESS WHEREOF, I have</p> <p>20 hereunto set my hand this 19th day of</p> <p>21 February, 2018.</p> <p>22 </p> <p>23 _____</p> <p>24 THERESA TRAMONDO</p> <p>25</p>
<p style="text-align: right;">Page 143</p> <p>1 Dos Reis</p> <p>2 A. The second time around? No, I</p> <p>3 don't believe so, no.</p> <p>4 MR. LEVINE: All right. No</p> <p>5 further questions.</p> <p>6 MR. PEARCE: No questions on our</p> <p>7 side.</p> <p>8 (Time noted: 3:27 p.m.)</p> <p>9 _____</p> <p>10 CHEVON DOS REIS</p> <p>11</p> <p>12 Subscribed and sworn to before me</p> <p>13 this ____ day of _____, 201__.</p> <p>14 _____</p> <p>15 _____</p> <p>16 Notary Public</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 145</p> <p>1</p> <p>2 ----- I N D E X -----</p> <p>3 WITNESS EXAMINATION BY PAGE</p> <p>4 C. DOS REIS MR. LEVINE 5/126</p> <p>5 MS. MATTHEWS 113</p> <p>6 ----- INFORMATION REQUESTS -----</p> <p>7 DIRECTIONS: 134, 135, 135</p> <p>8 RULINGS: (NONE)</p> <p>9 TO BE FURNISHED: (NONE)</p> <p>10 REQUESTS: (NONE)</p> <p>11 MOTIONS: (NONE)</p> <p>12 CONFIDENTIAL: (NONE)</p> <p>13 ----- EXHIBITS -----</p> <p>14 DOS REIS FOR ID.</p> <p>15</p> <p>16 Dos Reis Exhibit 1, document, 11</p> <p>17 declaration of Chevon Dos Reis</p> <p>18 (EXHIBITS RETAINED BY REPORTER.)</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

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NAME OF CASE: NAACP VS. ERCSD, ET AL.
DATE OF DEPOSITION: FEBRUARY 7, 2018
NAME OF WITNESS: CHEVON DOS REIS

PAGE	LINE	FROM	TO

CHEVON DOS REIS

Subscribed and sworn to before me
this ____ day of _____, 201__.

(Notary Public) My Commission Expires:

[& - answer]

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